

Priorities for the French presidency of the European Union about chemicals

#health #environment #food #agriculture

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Countless studies have shown it: **chemical pollution** does have a **negative impact on human health and biodiversity**. It is an undeniable fact. Agriculture, industry, combustion, common goods and more, numerous sectors are involved. How then, can we explain that **the preservation of our biodiversity is not at the heart of the Green Pact for Europe** launched on December 11th 2019 by the European Commission?

France was **at the forefront on those issues** in the past. For that, we can turn to the prohibition of bisphenol A or the policies around endocrine disruptors (ED). If France wants to keep being at the forefront of those issues, it needs **to develop an ambitious, innovative health and environment policy** during its **presidency of the European Union**, and not be satisfied with simple PR.

Involving chemicals, the French presidency needs to address multiple issues such as:

- the **reduction of exposure**
- **revising of existing regulation**
- the **improvement of research**
- **environmental and health monitoring**
- **holding industrial companies accountable**
- **promotion of alternatives**

We propose **6 key points** with achievable objectives and actions to undertake **during the 6-month French presidency**.

1. Reduce chemical exposure on populations and biodiversity

This project passes through with **reductions at the origin of known or suspected exposure** sites that are harmful for public health: air, water, soils, food, every-day goods etc. The aim is to **protect the general well-being of vulnerable populations** (pregnant women, babies, the sick...). Information campaigns must therefore be organised.

Our demands:

- **Stand against the glyphosate** authorisation renewal due to expire in December 2022¹. It will go in favour of the legitimate demands from the public as showed by multiple petitions² and surveys³.
- France must include the reduction strategy for chemicals as shown in the Green Deal objectives as part of the revision of the directive on the sustainable use of pesticides published at the end of March 2022 by the European Commission. France must **commit to**

¹ Générations Futures, Evaluation du Glyphosate, un rapport gravement biaisé !

² ECI Save and Farmers and Stop Glyphosate.

³ Survey by Générations Futures

promoting the use reduction by 50% of all pesticides and eliminating the more dangerous ones⁴. It can be done by better promoting the **integrated production – IPM** (integration and control⁵) and by setting binding commitments (notably in Strategic National Plans⁶) for countries based on appropriate research⁷. France must obtain the **prohibition of active pesticide** substances mentioned in the general inspections' reports⁸.

- As part of the Chemical Sustainability Strategy of EU⁹ published in October 2020 by the European Commission, demand the prohibition without any derogation of dangerous chemicals from goods and foods. Put a priority on withdrawing any worrying substances (SVHC) from the market, Eds and carcinogenic, mutagenic or reprotoxic – CMR (confirmed or suspected), or harmful for neurological development, nanomaterials included. In those categories, the suspected substances must undergo thorough examination.
- Promote real eco-friendly labels for food supplies. It must be done through the implementation of the Planet Score – including its pesticide control aspect – at a national level using the French presidency of the EU as an accelerator of negotiations on sustainable labelling of the EU due for 2023-2024. Furthermore, anticipating the substitution or withdrawal of dangerous substances from common goods on the market, we would suggest the introduction of informative labelling keeping track of those same substances (cosmetic, medication, common or manufactured goods).
- Based on its own experience, France must inform other member states on the insufficient efforts provided by the EFSA towards its will or lack thereof to re-examine the 2014 Orientation document on the assessment of exposure of farmers, residents and pedestrians to pesticides¹⁰.

2. Push for a reform of European bodies in charge of overseeing chemical substances

Multiple reports show a great deal of deficiencies and weaknesses in the current regulation notably regarding assessments. France, through its presidency can strive to change that.

Our demands:

- As part of the **European Strategy for sustainability in chemicals**, go from a case-by-case substance regulation to a **regulating group of substances**, from PFAS to all other organic persistent chemicals (POP) and ED so we can get rid of “regrettable” replacements.
- Demand **the revision of criteria** what does and does not make an ED as well as agreeing on a **clear definition** of ED for every European ruling on chemical regulation. It would introduce **a three-level categorisation** (confirmed, presumed, suspected) supported by the French government.
- The revision of the **CLP regulation** proposition will be published during the French presidency for the EU. France must encourage the Commission to **mandate the EFSA** to always test toxicity for **human growth** and **immunotoxicity** for every substance. Furthermore, the EFSA must expedite the **identification process for ED pesticides¹¹** and

⁴ Defined as pesticides containing forbidden substances

⁵ PAN Europe, report on SUD evaluation shows that France does call for better implementation

⁶ PAN Europe, Position on the EU Farm to Fork Strategy and the EU Biodiversity Strategy for 2030

⁷ PAN Europe, Factsheet: which indicators to best measure the EU objective of pesticide use and risk reduction

⁸ Utilisation des produits pharmaceutiques, Tome 1, December 2017

⁹ European Union, Chemical Sustainability Strategy

¹⁰ A radius of at least 25 meters of non-pulverised soil must be respected around houses, playgrounds, and public grounds.

¹¹ The lack of data cannot be interpreted as a lack of effects endocrine disruption effects or as proof of safety

make the results public, following ECHA's example¹². **Approve testing** to prove ED has effects on the **thyroidal axis** is urgent, they do not yet exist. Finally, and most importantly, France must promote mixing assessment factor (MAF) by the EFSA. It would prevent **cocktail effects**¹³ as set out by the European strategy for sustainability in the field of chemicals.

- Add risk evaluations on chemical packaging for pesticide formulation as they are used by consumers through in vivo testing¹⁴.
- Ban pesticides containing active substances that were not thoroughly examined or backed by industrial studies reports from the last 10 years from markets (as provided by regulation 1107 / 2009)¹⁵.
- Ban all pesticides and biocide that have missing data. Oppose derogations for prohibited substances for their hazardousness.
- Publish every evaluation report to the public including additional data provided by industrial companies. This would include every report on **pesticides, biocides, plastics, nanometals** as well as every vote registered during SCOPAFF in a readable format.
- Oppose **double-standards**. Imported foods **must answer** to the EU regulation as well as sanitary and environmental standards. In tandem with a global reform of trading policies in the EU, **regimes of exceptions** around pesticides **must be lifted** to guarantee that no substances banned by the EU **can be imported** in foods for animal or human consumption.
- See to that the Commission swiftly delivers its revision on regulation PIC proposition¹⁶. It would include a ban on any chemical that has not been approved by the EU, including pesticides, in accordance with the European strategy for sustainability on chemicals.
- **Follow up on every approved chemical** by independent organisations. The aim would be to report on the impacts of approved pesticides and biocides on public health and the environment. Reports are to be funded by chemical and industrial companies but undertaken **by independent organisations**.
- As suggested by the general inspections report¹⁷, **create a unique agency** focused on health, the environment and food, that would regroup the EFSA and the ECHA.
- Expand the **Labbé Law**¹⁸ at the EU level. Since 2017 it forbids the use of pesticides in public spaces as well as selling pesticides to consumers.

3. Hasten better research

Research time on chemicals is extremely **expensive, complex and time consuming**. At times, reports are **incomplete or even heterogenous** depending on who published them. In France, ED surveillance in the air and in the soil is **almost non-existent**¹⁹. **Better funding** must be allocated towards European expertise.

Our demands:

- **Boosting research** on chemicals (ED, nanomaterials, CMR, persistent and bioaccumulative and toxic substances (PBT) as well as very persistent and very bioaccumulative (vPvB)), on

¹² Endocrine disruptor assessment list – ECHA (europa.eu)

¹³ PAN Europe, How to best address cocktail effects in the Pesticide legislation?

¹⁴ Secrets Toxiques

¹⁵ Génération Futures, Evaluation du glyphosate : un rapport gravement biaisé !

¹⁶ EU Regulation n°649/2012

¹⁷ IGAS, La santé environnement : recherche, expertise et décisions publiques

¹⁸ Générations Futures : Zones non agricoles : Nos organisations demandent la généralisation de la Loi Labbé en Europe

¹⁹ Générations Futures : Rapport SNPE

the “**cocktail effect**”, the consequences of **multiple micro-exposures** and on the **exposome**.

- **Promote adapted testing by independent laboratories and researchers**, prioritising studies around ED and nanomaterials. Their work should be focused on **the source of contamination** (wrapping, cosmetics, textile, toys, childcare articles, medicine, medical devices), **the way they are exposed and how they operate** (cocktail effect, cumulative and transgenerational) on human beings and the eco-system.
- **Suggest the creation of a European institute of the sciences of environmental health** based on the American National Institute of Environmental Health Sciences (NIEHS). This European institution would focus its research on environmental health to better understand interactions between the environment and human health.

4. **Give Europe statistical tools to lead better environmental policies**

Currently, there is no complete data on the exposure of industrial or agricultural pollutant in Europe. Nor is there any registry of pathologies linked to those same pollutants. Every member state should be able to provide this data. However, in France, the 14 cancers registries for the metropolitan area only covers 19 counties²⁰.

Our demands:

- **Initiate the creation of European geography-based information system** based on the California Environmental Health Tracking Program²¹. This system would keep track of every chemical substance in Europe and inform the public on which pesticide they may be exposed. It would then cross-reference those same chemicals with registries of pathologies.
- Give the **public access** to a database keeping track of every pesticide being used in the EU **geo-tagged on every European farming plot**²².
- Within the European **reform on agricultural statistics**²³, promote the implementation of a **tool that would collect and publish yearly data**. It would collect data on pesticides, biocides, and veterinarian products included in the treatment registers with unlimited and simplified access for European and national policymakers.

5. **Hold industrials companies accountable and apply the polluter pays principle**

Industrial companies are mainly responsible for the pollution originated by the dissemination of chemical substances on the market. Act under the European strategy for sustainability in chemical fields would allow better regulation for industrial activities.

Our demands:

- **Apply financial sanction** on companies that produces and distribute known or suspected dangerous products on health and the environments (DE, CMR, SVHC, PMT) and that do

²⁰ Registre des cancers, le réseau francim

²¹ California Environmental Health Tracking Program

²² Cf. décision CJUE

²³ Shake ton Politique, Interpellation sur les statistiques agricoles

not develop any safe alternative. France must promote measures that **hike taxes**²⁴ on pesticides depending on their toxicity (targeted fees that would finance quality control as well as research).

- **Make development and the transition towards non-toxic materials mandatory** (toxic compounds in recyclable plastic for example). Chemical risk must be considered in its entirety.
- Demand **complete transparency** on the chemicals used by suppliers on plastics.

6. Promote viable alternatives

Effective and immediate alternatives are already readily available to preserve human health and the environment.

Our demands:

- **Promote organic farming** by making CAP more ambitious. France's CAP must be exemplary as there is still much work to be done²⁵
- **Reassert our opposition to GMOs** (transgenic) and abandon support for **new GMOs (mutagenic)**. France's agroecological credibility depends on this stance.
- **Not to promote** to the Commission or other member-states our High environmental value label (HEV) **as a durable environmental model to be used in our CAPs** except to review their requirements specifications²⁷. This type of agricultural system, as it is presently defined, **is not ambitious enough to be ecologically durable** and become a viable alternative to intensive chemical agriculture.

With this document, we share with the French government some guideline that would allow France to establish clear and concrete ambitions and objectives. **By the middle of the French presidency mandate, we will analyse the situation to see if France will have taken enough opportunities.** This will show what has improved and what needs to be improved on.

NGOs that support these demands are:

PAN Europe, Réseau Environnement Santé, Justices Pesticides, Association Santé Environnement France, Terre d'abeilles, CCFD Terre Solidaire, Cantine sans Plastique France, BioConsommateurs, Miramap, Collectif BAMP!, Eva pour la vie, Stop aux cancers de nos enfants, ISF Agrista, Collectif de soutien aux victimes des pesticides de l'Ouest, Mouvement de l'Agriculture Bio-Dynamique, Sciences Citoyennes, PRIARTEM, la FNAB

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²⁴ PAN Europe, Pesticide taxation

²⁵ IFOAM, Assessing organic farming support measures in current draft national CAP Strategic Plans for the Common Agricultural Policy 2023-2027

²⁶ META, The empty green tin of the new CAP

²⁷ IDDRI, La certification Haute valeur environnementale dans la PAC : enjeux pour une transition écologique réelle

Contextualisation appendix

Since the 1950s, hundreds of thousands of substances have been flooded into the market, without being tested for the most part. And yet, since the 1960s, scientists have warned against the dangers of some of those substances. The Chemical strategy for sustainability²⁸ on a European level reminds us that in 2018, **chemicals that present a danger for human health represent 74% of the total chemical production in Europe**. It has not changed since 2004. Around 3.5 million sites around Europe have been contaminated by dangerous substances including lasting chemicals. Chemical production is set to double by 2030²⁹ on a global scale.

We are all exposed to contaminants. The French Estaban³⁰ bio surveillance inquiry demonstrates that the entirety of the population has come into contact with polluting chemicals. Some endocrine disrupters (ED) or cancerous. An independent inquiry by Generations Futures on hair sample of woman of age of procreation and living in and around Paris has revealed that 21 Eds³¹ have been detected.

Furthermore, in France as well as any other developed country, **the chronic diseases epidemic**³² has become a threat to public health and safety. The main factor is our way of life and the degradation of our ecosystem. Among the different risk factors³³, **we find different types of pollution**: atmospheric, unclean air, allergen exposition, dusts, and chemicals. The explosion of those diseases **and their link with EDs** has been proven in 2012 by a WHO report³⁴. This echoed and 2009 study by the Endocrine Society blowing the whistle on the necessity of reducing chemical exposure especially before and during pregnancies³⁵. Numerous other studies have demonstrated the link between ED exposure and chronic diseases^{36 37 38 39}. The same can be said for pesticides that are closely related to EDs⁴⁰. It is time for France, having taken decisions on ED regulation, to become stricter on the use of pesticides.

According to WHO, **12 to 13 million deaths** around the world (23% of global mortality per years) are linked to **environmental causes** (air and water pollution). The European Environmental Agency estimates it represents **13% of all deaths in Europe (or 630 000 deaths per year)**⁴¹. ED exposure would be responsible for diseases that would cost between 157 to 270 billion euros a year or between 1.2 to 2% of the EU GDP⁴².

²⁸ European Union, [Stratégie durable dans le domaine des produits chimiques](#)

²⁹ French government, [Plan National Santé Environnement 4](#)

³⁰ Santé Public France, [Enquête Esteban](#)

³¹ Générations Futures, [Enquête Expert4](#)

³² Cancers, cardiovascular diseases, breathing diseases, obesity, diabetes, infertility, early puberty, or cognitive and behavioural disorders

³³ Adding unhealthy eating, and tobacco consumption

³⁴ WHO, [Endocrine Disrupting Chemicals 2012](#)

³⁵ Endocrine Society, Endocrine disrupting chemicals

³⁶ Thaddeus T. Schug et al, *Endocrine Disrupting Chemicals and Disease Susceptibility*, J Steroid Biochem Mol Biol. 2011 November; 127(3-5): 204–215.

³⁷ Demetrios Petrakis et al, *Endocrine Disruptors Leading to Obesity and Related Diseases*, Int. J. Environ. Res. Public Health 2017, 14, 1282.

³⁸ Andrew G. Kirkley, *Environmental Endocrine Disruption of Energy Metabolism and Cardiovascular Risk*, Curr Diab Rep. 2014 June; 14(6): 494.

³⁹ [Plaque d'information : Perturbateurs endocriniens : s'informer pour se protéger](#), Générations Futures

⁴⁰ Sara Mostafalou, *Pesticides and human chronic diseases: Evidences, mechanisms, and perspectives*, Toxicology and Applied Pharmacology 268 (2013) 157–177.

⁴¹ Assemblée Nationale, [Compte Rendu n°64 Commission d'enquête sur l'évaluation des politiques publiques de santé environnementale](#)

⁴² [Scientific studies](#) in the *Journal of Clinical Endocrinology and Metabolism* de l'Endocrine society, published in 2015