

Paris, le 24 octobre 2022

À l'attention de

Monsieur le Président de la République, Emmanuel Macron,
Madame la Première Ministre, Elisabeth Borne,
Monsieur le Ministre de la Transition Écologique et
de la Cohésion des territoires, Christophe Béchu,
Madame la Secrétaire d'Etat chargée de l'Ecologie, Bérangère Couillard,
Monsieur le Ministre de la Santé et de la Prévention, François Braun,
Monsieur le Ministre de l'Économie, des Finances et de la Souveraineté
industrielle et numérique, Bruno Le Maire,

Objet : La France doit être claire sur sa position concernant la réglementation européenne sur les produits chimiques

Madame la Première Ministre,

Nous avons appris avec une grande inquiétude le 19 octobre que, malgré les attentes fortes des **ONG**, de certains **pays** (dont la France...) et de certains **eurodéputés**, **la révision de la réglementation européenne sur les produits chimiques risque d'être repoussée probablement après 2024. C'est une énorme déception est surtout une source d'inquiétudes** car cela signifie que les décisions visant à exclure du marché européen des familles de produits chimiques dangereuses seront également reportées.

Pourtant, depuis son entrée en vigueur en 2007, de nombreuses faiblesses du règlement REACH ont été régulièrement pointées du doigt, notamment la complexité et la lenteur des processus d'évaluation, limitant considérablement l'efficacité du règlement à restreindre et substituer les substances les plus dangereuses. **La stratégie européenne pour la durabilité dans le domaine des produits chimiques reconnaît ces failles et pointe la nécessité de réviser en profondeur le texte.**

Le fait que la Commission européenne, sous pression de certains acteurs économiques, ait renoncé à avancer sur ce dossier - dossier que pourtant elle portait jusqu'à présent - est très inquiétant. Nous nous inquiétons également de la position de la France sur ce dossier. En effet, il semblerait que le ministre de l'Economie **Bruno Le Maire** et le Commissaire européen **Thierry Breton** en charge du **marché intérieur et de l'industrie**, aient tranché en faveur d'un report de cette révision de REACH, favorisant ainsi les intérêts de l'industrie chimique au détriment de la santé publique et de l'environnement. **Pourtant nous n'avons vu aucune position officielle de la France sur le sujet, ce que nous regrettons fortement !**

Vous le savez, la révision de ces réglementations est cruciale, elles doivent permettre notamment :

- **l'évaluation des chimiques non plus substance par substance mais par famille de produits, ce**

qui améliorerait grandement l'efficacité des procédures d'évaluation. L'exemple le plus emblématique ici étant celui des **PFAS** (perfluorés), grande famille de plus de 4000 composés, considérés tristement comme des « polluants éternels ».

- **l'identification – enfin- des perturbateurs endocriniens** car pour le moment les données nécessaires à cette identification ne sont pas demandées ! Et donc l'exclusion de ces substances dangereuses.
- **la possibilité de prendre – enfin ! – en compte l'exposition à des mélanges de substance** en vue de limiter le risque d'effets cocktail
- **la possibilité d'interdire certains usages** grand public et professionnel de substances les plus dangereuses.

Ces mesures sont indispensables à la protection des citoyennes et des citoyens européens et de leur environnement. **Le report de cette réforme est donc dramatique** d'un point de vue sanitaire et environnemental.

Notre association n'est pas seule à manifester son mécontentement, nous sommes de nombreuses organisations à nous en inquiéter comme en témoigne le courrier en Annexe cosigné par de nombreux partenaires européens.

La France fut pendant des années leader européen sur le sujet de la santé environnementale et des produits chimiques : Bisphénol A - et plus globalement les perturbateurs endocriniens - , le TiO₂, les néonicotinoïdes - et même plus généralement les pesticides avec le plan Ecophyto. **Or depuis quelques temps, notre pays régresse dramatiquement sur ces sujets**, suscitant de vives inquiétudes.

Près de 40% des Européens sont confrontés à des cancers en partie causés par l'exposition aux polluants chimiques. Cela représente un coût de 157 et 270 milliards d'euros en termes de dépenses de santé et de perte de revenus potentiels chaque année pour les États membres. Il n'est plus temps d'attendre et de prétexter des coûts économiques néfastes que la révision de la réglementation chimiques aurait pour les industriels de la chimie. Faire passer d'abord des intérêts économiques privés devant des intérêts sanitaires et environnementaux publics n'est plus acceptable. **L'urgence est là et le report de l'action en la matière vous rendra responsable de leurs conséquences néfastes.**

Nous ne pouvons croire que vous renoncez à voir cette révision se faire rapidement alors même que ce sujet de la prévention des effets des polluants chimiques est au cœur de la feuille de route de votre gouvernement. **Nous attendons donc de la France qu'elle se positionne clairement en faveur de l'adoption de la révision de ces textes au plus tard en mars – avril 2023** comme cela était initialement prévu et qu'elle mette tout en œuvre au niveau européen pour que cela advienne.

Dans l'attente d'une réponse que nous espérons favorable, nous espérons pouvoir compter sur votre ambition en matière de santé environnementale qui ne serait pas revue à la baisse au prétexte de la pression de quelques acteurs économiques.

Madame Maria PELLETIER
Présidente de Générations Futures





Brussels, 21 October 2022

To: EU national Ministers for Environment, Health, and Agriculture

Guaranteeing the timely delivery of the EU Green Deal for health: reforming the REACH and CLP regulations and agreeing on the Sustainable Use of Pesticides Regulation are not optional

Dear Ministers,

On behalf of public health groups working together across Europe, we are writing to you to express our deep concerns at the current delays in the delivery of several European Green Deal initiatives to address our everyday exposure to harmful chemicals, which are crucial for improved disease prevention and health protection today and in the coming decades.

We need you to send a strong signal to the European Commission President that the reforms of the REACH and CLP regulations as promised under the Chemicals Strategy for Sustainability (CSS) are not optional, but crucial for public health and a healthy economy. We also call on you to support the Commission's proposal for the Regulation for the Sustainable Use of Pesticides (SUR), as promised under the Farm-to-Fork Strategy, to help reduce Europe's dependence on pesticides.

If well-crafted, these reforms for industrial chemicals and pesticides can provide pivotal shifts in the way Europe manages the production and release of synthetic chemicals, and support their reduction. This would be an important gain as we are all exposed, mostly unwillingly, to harmful substances through consumer products we use, the air we breathe, the work we perform, the food we eat, and the water we

drink. These chemical cocktails build up in our bodies and increase the risk of serious diseases and health conditions, including but not limited to cancers and disorders of our reproductive, metabolic, or behavioural functions. In practice, the implementation of the promised reforms can significantly improve people's lives by guaranteeing healthier and more sustainable living and working environments and a fundamental shift in the way our economy operates and provides for every individual's basic needs.

Importantly, these reforms can also alleviate the current burden weighing on member states' authorities when they want to bring forward regulatory measures to protect their citizens and their environment, or promote the implementation of fundamental EU principles such as the polluter pays principle.

Unfortunately, the EU Green Deal implementation is today being challenged on unjustified grounds, including geopolitical considerations such as the Ukraine war and the safeguarding of food security. It is important to note that the latter in fact makes an urgent case in favour of an even faster sustainable transition towards a healthy, just, and environmentally-friendly food system, whereby Europe develops its environmental, health and economic resilience, strategic autonomy, and sobriety [1]. Such short-termism is not acceptable and fails to see the untapped potential of a stronger chemical and pesticide legislative framework for citizens and economic players alike.

Scientific knowledge about the state of (agri-)chemical pollution keeps piling up and has reached unprecedented levels of concern that require robust and swift political responses. Among the latest warning signals, scientists have highlighted that the pollution created by PFAS chemicals (short for per- and polyfluorinated-alkyl substances, that are also known as 'forever chemicals' as they can take up to 1,000 years to break down in nature) has now exceeded the planetary boundaries [2]. This means PFAS pollution is ubiquitous across the planet and almost irreversible, and that we are all exposed. This is particularly worrying when put in perspective of existing health costs assessment for our exposure to PFAS: for Europe alone, the annual costs of health impacts associated to PFAS exposure are estimated to be between the 52 - 84 billion Euro range [3].

The example of PFAS pollution clearly illustrates that chemical pollution knows no border and that urgently addressing it in a coherent way has become a priority for the future of our health, our environment, our economy and societies as a whole. Yet, the recent European Commission's postponing of the publication of the REACH reform proposal to the fourth quarter of 2023 raises serious doubts that the EU executive realises the extent and urgency of the problem and questions its commitment to its own objectives and workplan under the EU Green Deal [4].

The use of harmful pesticides in agriculture, green and urban public spaces continues to put the health of farm workers and citizens at risk, including that of young children. Occupational exposure to pesticides has been linked to serious diseases, such as certain types of cancer and respiratory diseases as well as cognitive disorders and Parkinson's disease [5]. Communities living in agricultural areas are also affected, as pesticides are typically detected at distances of 5 to 600 meters from where they have been used [6].

This increasing pollution and our continuous exposure are having an impact on our health, and our health systems and wider economy. This is why we are urging you, as member states' representatives, to play

your important part in supporting the delivery of the EU Green Deal. Priority initiatives for health protection from chemicals include the following:

The swift reform of the REACH and CLP regulations

We ask you, member states representatives, to demand that the European Commission urgently bring out:

- The reform of the CLP regulation:
 - Support the recent European Commission proposal for the addition of new hazard classes, including for endocrine disrupting chemicals;
 - Encourage the European Commission to publish its proposal for the reform of the main CLP legislative text by the end of 2022.

- The reform of the REACH regulation:
 - Demand that the European Commission brings forward its proposal as soon as possible and in any case before the end of 2023, despite the concerning postponing of the publication date in the 2023 Commission's work programme;
 - Constructively contribute to the preparatory work of the above-mentioned legislative proposal.

The adoption of the SUR regulation, now being discussed in Council and European Parliament:

We ask you, member states representatives, with regard to the Commission's proposal to:

- Support the proposal's legally binding 50% reduction target by 2030 in the use and risk of synthetic pesticides at EU and national levels;
- Modify the existing tool that calculates pesticide reduction to objectively promote the use of safer alternatives and non-chemical methods;
- Support the proposal for a total ban on the use of all pesticides in areas used by the general public, particularly pregnant women and children;
- Expand the 3-meter pesticide-free buffer zone in proximity to areas used by the general public to at least 50 meters, or to at least 100 meters if these areas are used by children, babies and pregnant women.

We thank you for considering our significant concerns and we trust your willingness to constructively support the successful delivery of the European Green Deal in view of promoting a healthier, more resilient and autonomous Europe for today's and future generations.

Yours faithfully,

Genon K. Jensen

Executive Director, Health and Environment Alliance (HEAL)

On behalf of:

Alerte des Médecins sur les Pesticides (AMLPP)

Association of European Cancer Leagues

C2DS

Cantine Sans Plastique France

Génération Futures

Health and Environment Justice Support (HEJSupport)

International Society of Doctors for the Environment (ISDE) Italy

Pesticide Action Network (PAN) Europe

Pesticide Action Network Netherlands

Portuguese Society of Environmental Health

Réseau Environnement Santé (RES)

Tegengif / Erase All Toxins

Women Engage for a Common Future (WEFC) France

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 90 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region

Mundo-Madros, Rue de la Charité 22, B-1210 Brussels – Belgium Tl. 32 2 329 00 80 E-mail: info@env-health.org www.env-health.org

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

Notes:

[1] Pörtner, L. M. et al. (2022). “We need a food system transformation – in the face of the Ukraine war, now more than ever.” *One Earth*. <https://doi.org/10.1016/j.oneear.2022.04.004>

[2] Cousins, I., T. et al. (2022). “[Outside the Safe Operating Space of a New Planetary Boundary for Per- and Polyfluoroalkyl Substances \(PFAS\)](#).” *Environmental Science & Technology*. DOI: 10.1021/acs.est.2c02765

[3] Nordic Co-operation (March 18, 2019). “The cost of inaction: A socioeconomic analysis of environmental and health impacts linked to exposure to PFAS.” doi: 10.6027/TN2019-516

[4] European Commission, 2023 Work Programme, https://ec.europa.eu/info/publications/2023-commission-work-programme-key-documents_en

[5] Inserm, 2021 Collective Expert Review. <https://presse.inserm.fr/en/inserm-publishes-its-latest-collective-expert-review-on-the-health-effects-of-pesticides/43303/>

[6] Cech et al, 2022. “[Pesticide drift mitigation measures appear to reduce contamination of non-agricultural areas, but hazards to humans and the environment remain](#)” *Science of the Total Environment*, DOI: 10.1016/j.scitotenv.2022.158814