

Call the European Commission to deliver on Green Deal's commitments on chemicals, food systems and animal welfare.

The health of Europeans and the future of the EU green economic transition are at stake.

8. November 2023

Att.: The Minister of Environment of Denmark & The Minister of Food, Agriculture and Fisheries of Denmark.

Dear Magnus Heunicke and Jacob Jensen.

On behalf of Green Transition Denmark, Plastic Change and The Danish Consumer Council THINK, we are writing to you ahead of the General Affairs Council on 15 November, during which the European Commission's 2024 Work Plan will be presented. **We urge you to call on the European Commission to uphold the commitments outlined in the 2020 [Chemicals Strategy for Sustainability](#) (CSS) and in the [Farm to Fork \(F2F\) Strategy](#) and ensure their fulfilment before the end of this Commission's mandate.** These commitments are key to better protect citizens' health and the environment, boost innovation for safe and sustainable chemicals, and empower farmers and consumers in the move to sustainable food systems. This is critical for the green transition and long-term competitiveness of the European industry and agri-food sector, as well as providing predictability and allowing the EU to play a leading role globally.

Pollution is one of the main [threats](#) to people's health due to wide exposure to chemicals present in the environment and everyday products, from toys to childcare articles to food items and containers, cosmetics, furniture and textiles. Scientists found "[alarmingly high](#)" chemical exposure of European citizens to multiple hazardous substances above levels that could cause serious illnesses, such as cancer, infertility and developmental disorders in children. In the meantime, according to the Commission's own [findings](#), the EU sold production of chemicals is on the rise for the last decade, reaching its record, €872 billion, in 2022. Hence, we consider that it is the right time for future proof investments that will enable prosperity of the European Union.

Poor diets have also become a [major threat](#) to our health, while unsustainable agriculture is pushing the EU beyond a safe and fair operating space on nearly all [planetary boundaries](#), and industrial-scale animal farming is causing huge [suffering](#) as well as alarming [environmental](#) and [public health](#) threats. There is a clear consensus among [scientists](#) that the EU's food system needs to change, and that the cost of inaction or delays will be worse than that of acting now.

The Commission has delivered some important elements of the CSS and F2F, such as the long awaited revision of the regulation on classification, labelling and packaging of substances and mixtures (CLP Regulation) and the proposal for a Sustainable use of Pesticides Regulation (SUR) you are currently negotiating. However, **key proposals to support the achievement of the European Green Deal's toxic-free and zero pollution ambitions remain undelivered.**

We regret that the current Commission may not present the revision of the main chemicals control law, the [REACH](#) Regulation, nor most of the animal welfare legislation overhaul, nor the new legislative framework for Sustainable Food Systems within its mandate. REACH and animal welfare legislation have been flagship EU laws and made Europe lead the world on chemicals control and animal welfare. But after 15+ years, it has grown old and clearly suffers from many shortcomings that hinder its effectiveness and need to be urgently fixed. Hence, **we call on you to express strong regret at such delay, in particular given the [European](#)**

[Environment Council's support](#) for REACH revision, and ask the Commission not to interrupt the ongoing technical work and to present the three above mentioned proposals promptly upon completion.

Furthermore, **numerous crucial actions outlined in the CSS are still pending** and can be accomplished within the current Commission's term, presented in the attached annex to this letter (page 3).

We urge you to demand from the Commission that it continues revising the REACH regulation and EU animal welfare legislation, publishes the legislative proposal for a framework for Sustainable Food Systems, and proposes legal measures to fulfil the ambitious goals outlined in the Chemicals Strategy for Sustainability and Farm to Fork Strategy, a plan supported by civil society, industry, and EU institutions, including the Council of the EU, ensuring their full implementation before the end of your term.

The time is now for the EU to invest in a better future for all. Our health, our children, and our planet deserve nothing less.

Sincerely,

Pernille Haagen Larsen, Circular Economy Advisor



Claus Jørgensen, Project Manager Chemicals



Claudia Sick, Environmental Knowledge Officer

Annex: Pending crucial actions outlined in the CSS that can and should be accomplished within the current Commission's term:

- Conclude the **'One Substance, One Assessment'** process to harmonize and increase transparency, predictability and coherence of the chemical assessment across laws and agencies. This process includes: the **retribution of tasks on chemicals to EU Agencies, transparency and reuse of data** allowing EU and national authorities to commission testing, **ECHA's founding regulation**, to improve the predictability and stability of ECHA's financing as well as the development of a **common open data portal** on chemicals and a **repository of health-based limit values**.
- Continue the implementation of the **Restrictions Roadmap**; the **PFAS action plan**; and **introduce legal requirements and tracking the presence of substances through their life cycle utilizing product policy** - with close attention to the ongoing negotiations of key policies including the Eco-design for Sustainable Products and Packaging Regulations, to **ensure that the most harmful chemicals are phased out** in consumer products and for professional uses, unless their use is proven essential for society.
- Publish the **Communication on Essential Use Concept** to support decision making on when it is justified to use hazardous chemicals in a more transparent and predictable way.
- **Implement the current REACH better**, to increase effectiveness by abiding to the obligations of REACH without adding requirements that are not included in the law, moving towards grouping approaches, and faster decision-making that does not waste resources on non-compliant applications. As well as adopt needed **implementing acts** to update information and risk assessment requirements regarding chemicals, essential to ensuring that; authorities obtain the right information on what enters the market; EU policies are implemented uniformly and effectively; and fully aligned with the latest state of science.
- **Promote safe and sustainable chemicals globally** along with an **export ban** on hazardous chemicals prohibited in Europe, for the EU to be a frontrunner leader in chemicals management avoiding EU double standards and actively ensure that international standards are more ambitious and protective for human health and the environment.
- Introduce or reinforce provisions to take into account **combination effects** in industrial chemicals, food contact materials and cosmetics legislations.
- Establish an **EU Chemical Early Warning and Action System** to address emerging risks.
- Establish an **EU-wide safe and sustainable-by-design support network** and develop **Key Performance Indicators** to promote safe and sustainable chemicals.