

The Rt Hon Matt Hancock MP
Secretary of State for Health and Social Care
39 Victoria Street,
London,
SQ1H 0EU

30th November 2020

Dear Secretary of State,

CC: Rebecca Pow MP, Jonathan Ashworth MP, Phillip Dunne MP, Rt Hon Jeremy Hunt MP, Tonia Antoniazzi MP, Craig Tracey MP

Regulating Harmful Chemicals: Responsibilities of the New National Institute for Health Protection

We are writing to seek clarification on the responsibilities of the National Institute for Health Protection (NIHP)^[1] with regards to the regulation of harmful chemicals and their impact on public health.

For years, we have been deeply concerned that public and occupational exposure to harmful chemicals is contributing to a significant rise in the incidence rates of many public health conditions. Indeed, the World Health Organisation estimates the disease burden from such chemicals has led to 1.6 million deaths globally^[2]. Accordingly, we request that you act now to ensure that urgent attention is given, by the new NIHP, to policy measures that will address the environmental and occupational drivers of disease. This includes banning or restricting chemicals that are carcinogens, mutagens, toxic to reproduction, immunotoxic, neurotoxic and/or disruptive to the endocrine system (EDCs).

Risk from harmful chemicals is often exacerbated when exposure occurs to especially vulnerable groups including infants, children and pregnant women. According to the UN's Global Chemicals Outlook, harmful chemicals such as EDCs are now "ubiquitous in humans and the environment"^[3]. We ingest them through food and drink, inhale them in the air we breathe and absorb them through our skin. Over 1400 compounds are known or suspected EDCs and across Europe, the annual cost of EDC exposure and the consequent health impacts, is estimated at between €109-€157 billion^[4].

Such chemicals, even at low concentrations, can trigger chemical reactions in the body that increase the chances of suffering from chronic and lethal diseases. Examples include hormone-dependent cancers, such as breast and prostate cancers, obesity, diabetes, cardiovascular disease, reproductive problems, developmental effects, and neuro-behavioural difficulties^[5]. Throughout our daily lives we are exposed to a cocktail of chemicals including bisphenols in plastics, phthalates in personal care products, flame retardants in furniture and mattresses, per and polyfluoroalkyl substances in food packaging and toxic pesticides.

Despite the mounting scientific evidence, it is a matter of deep regret that neither the responsibilities assigned to the NIHP, nor public health and cancer strategies, include an explicit recognition of the need

to reduce or eliminate public exposure to harmful chemicals in our homes, workplaces and the environment, or an associated action plan. Given the NIHP's remit to prioritise prevention and reduce health inequalities, this omission is unacceptable and weakens our battle to prevent ill-health. We believe action now will positively contribute towards reducing the 40% of preventable cancers^[6] and meeting the WHO target to lower mortality from non-communicable diseases by 25%^[7].

We welcome the Government's pledge to put prevention at the heart of the public health agenda^[8], however, the Department of Health (DofH) must recognise that strengthening our knowledge of synthetic chemicals and how they interact with our bodies, is a core component of disease prevention. We need a fresh approach to the prevention of ill-health by prioritising primary prevention – acknowledging the public health risks of environmental and occupational exposure to potentially harmful chemicals.

Without such recognition, the government's approach to prevention remains structurally inadequate. This call for action is echoed by the former Chief Medical Officer^[9], the Environmental Audit Committee^[10], the Royal College of Obstetricians and Gynaecologists^[11], the WHO^[12] and the UN Special rapporteur on Toxins^[13]. The public too are demanding action^[14]. A recent survey found that over 85% of UK respondents are worried about the impact of harmful chemicals in everyday products on human health^[15].

To reduce the overall burden of disease, the NIHP and DofH must commit to a programme of work that aims to reduce or eliminate public exposure to harmful chemicals and be given a direct role in policy decisions to protect the nation's health. Whilst Public Health England has a remit to protect against environmental hazards it remains unclear how it supports the decision-making of Government bodies including DEFRA, the Hazardous Substances Advisory Committee, The Committee on Toxicity, Food Standards Agency and the Health & Safety Executive.

In sharp contrast, the European Union's executive agencies for Health & Food Safety and the Environment have worked together to deliver a new "Chemicals Strategy for Sustainability"^[16] and "Beating Cancer Plan"^[17]. Both strategies contain commitments to ban EDCs in consumer products and introduce legislative measures with targets to reduce exposure to carcinogens. Countries such as France^[18], Sweden^[19] and Denmark^[20] have already adopted their own action plans to safeguard public health.

It's time for the UK to develop its own action plan to support a non-toxic environment as part of the forthcoming Chemicals strategy and future public health plans. The Health & Safety Executive (HSE) is leading the new chemicals regulatory system, with input from the Environment Agency on environmental issues. We consider it vital that there is also an effective public health input into this process, from the NIHP and DoH.

As the UK prepares to exit the EU Transition period and develop its own chemicals regime, it is vital the NIHP and DofH work, in co-ordination with DEFRA and the HSE, to ensure we retain the highest level of protection for human health.

Accordingly, we call for the DofH to:

- **Acknowledge formally the public health risks of routine exposure to low levels of carcinogenic and other chemicals including EDCs used in everyday products** and recognise them as potential risk factors for cancer and other public health conditions.
- **Give the new NIHP explicit responsibilities to monitor, research and propose appropriate restrictions** on specific groups of harmful chemicals.
- **Adopt a cross-governmental approach to the management of harmful chemicals**, with the NIHP, HSE, DofH and DEFRA working together to support the creation of a non-toxic environment.
- **Raise awareness and provide training to Directors of Public Health, Public Health professionals and Clinicians** on the risks of public and occupational exposure to harmful chemicals.
- **Review and Implement existing legislation on workplace exposures to harmful chemicals.**
- **Implement, without delay, the recommendations of the Environmental Audit Committee's report on 'Toxic Chemicals in Everyday Life'.**

We would welcome the opportunity to meet with you and your designated officials to discuss these proposals further. We ask for a formal response on how DofH and NIHP intend to work together to include action on harmful chemicals as part of their strategic priorities to protect public health and the environment.

Yours sincerely,

Thalie Martini, Chief Executive, Breast Cancer UK

Dr Michael Warhurst, Executive Director, ChemTrust

Jamie Page, Chief Executive, Cancer Prevention and Education Society

Helen Lynn, Co-ordinator, Alliance for Cancer Prevention

Nick Mole, Policy Officer, Pesticide Action Network UK

Emma Rose, Director, Unchecked UK

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

Janet Newsham, Hazards Campaign

Lucila Granada, Chief Executive Officer, Labour Exploitation

Jonna Lewis, Policy & Strategy Director, Soil Association

Jacque Loughrey, Education and Prevention Officer, Pink Ladies Cancer Charity

Deborah Burton, From Pink to Prevention

Orlagh Glenn, Team Sorcha

Dr Michael Antoniou, Head: Gene Expression and Therapy Group, Kings College London

Professor Philippa Darbre, Professor Emeritus (Oncology), University of Reading



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