

The Right Honourable Theresa Villiers MP
Secretary of State for Environment, Food and Rural Affairs
DEFRA
Nobel House,
17 Smith Square,
Westminster
London,
SW1P 3JR

15th August 2019



Breast Cancer UK
BM Box 7767 London WC1N 3XX
T: 0845 680 1322
W: breastcanceruk.org.uk

Dear Secretary of State,

On behalf of Breast Cancer UK, I am writing to congratulate you on your appointment as Secretary of State for the Environment, Food and Rural Affairs. We would also like to take this opportunity to introduce you to our work, which is, of course, highly relevant to your new role, and share our thoughts on the outstanding issues affecting the UK's public health and environmental protections post-Brexit.

Breast Cancer UK is dedicated to the prevention of breast cancer, by tackling the environmental and behavioural risk factors associated with the disease, including exposures to carcinogenic, hazardous and endocrine disrupting chemicals. Breast cancer is the most commonly diagnosed cancer in the UK - 1 in 7 women will be diagnosed with the disease in their lifetime - and incidence rates are projected to rise by a further 2% between 2015 and 2035¹. Studies suggest that exposure to harmful chemicals in our environment - our water, our air, our soil - and our reliance on synthetic chemicals in everyday products could be contributing to these rising incidence rates².

In this context, we welcome the Government's commitment to retain a robust regulatory system for chemicals post-Brexit and to maintain a close relationship to the EU's REACH system, however we fear that currently there are crucial omissions within DEFRA's no-deal preparations that risk weakening existing chemicals standards. More specifically, with the UK due to leave the EU on October 31st, we remain extremely concerned that the REACH etc. (Amendment ETC.) (EU Exit) Regulations 2019³ fails to contain any commitment to align with future improvements in EU chemicals laws or ensure that vital mechanisms for stakeholder engagement and public participation are in place within a new UK Chemicals regime.

Over the years, the EU REACH system and associated regulations on chemicals, food contact materials, biocides and pesticides have successfully reduced consumer exposure to chemical pollutants, such as carcinogens and endocrine disrupting chemicals. While not perfect, we, alongside multiple industry bodies, health and environmental NGOs, regard REACH as the 'gold standard' for chemicals regulations⁴. The EU's precautionary approach, that underpins REACH, has successfully led to the restriction of numerous chemicals with links to breast cancer, including BPA and formaldehyde.

Accordingly, in the event of a no-deal Brexit, we call on the Government to take immediate steps to ensure that any new UK chemicals regime first mirrors and then keeps pace with the REACH system. Such an approach would incorporate the precautionary principle in full; feature a hazard-based approach to chemicals management and replicate the stakeholder and public participation arrangements of ECHA, within the Health & Safety Executive⁵.

¹ Cancer Research UK (2019) 'Breast Cancer statistics' available at: <https://www.cancerresearchuk.org/health-professional/cancer-statistics/statistics-by-cancer-type/breast-cancer> (Accessed: 14th August 2019)

² EEA (2012) 'Technical Report No 2/2012: The impacts of endocrine disrupters on wildlife, people and their environments The Weybridge+15 (1996–2011) report' available at: <https://www.eea.europa.eu/publications/theimpacts-of-endocrine-disrupters> (Assessed 14th August 2019)

³ The REACH etc. (Amendment etc.) (EU Exit) Regulations (2019)

⁴ European Union Committee (2018) 'Brexit: chemical regulation' 7th November 2018, HL 215, 2017-2019

⁵ Breast Cancer UK (2019) 'Written Evidence to the Environmental Audit Committee Inquiry into Toxic Chemicals in Everyday Life' available at: <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environmental-audit-committee/toxic-chemicals/written/97645.pdf> (Accessed: 14th August 2019)

In addition, as part of the Government's commitment to maintaining environmental protections post-Brexit, we very much welcomed the publication of the Draft Environment (Principles and Governance) Bill as a positive step forward to protect human health and the environment.

The Environment Bill is a crucial piece of legislation which will have significant implications for our continuing efforts to mitigate breast cancer risk. Accordingly, we have already submitted our proposals to DEFRA⁶, as we believe considerable work is still required to ensure that the legal accountabilities proposed in the bill do not weaken existing environmental principles/standards. In our view, it is vital that the Bill guarantees the maintenance of existing environmental principles, introduces legally binding targets for environmental objectives, protects the independence of the new Office for Environment Protection and enhances its enforcement capabilities. We look forward to the publication of the final bill during the second session of Parliament.

Finally, we believe that DEFRA's work on the forthcoming Chemicals strategy, as part of the 25-year Environment Plan⁷, represents a fantastic opportunity to support the development of a non-toxic environment that takes full account of the human health impact of chemicals linked to breast cancer. We very much welcome DEFRA's strategic intentions. Specifically, that this new strategy will "certainly include" a consideration of endocrine disrupting chemicals; seek to address priority chemicals in groups, consider the combination effects of different substances and look to act faster on substance restrictions⁸. As such, we fully endorse the recommendations of the Environmental Audit Committee's recent report into Toxic Chemicals in Everyday Life and call on DEFRA to adopt these within its Chemicals strategy⁹.

We look forward to supporting DEFRA in its work to maintain an effective regulatory system for the management and control of chemicals. Maintaining existing protections from harmful chemicals must be a post-Brexit priority for the new Government, and we ask for a response on how DEFRA intends to address these critical issues.

Once you have had the chance to settle into your new role, our Chief Executive would very much welcome the opportunity to meet with you, or your designated officials, to discuss our views and proposals in more depth.

I look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kit Bowerin', with a long horizontal line extending to the right.

Kit Bowerin

Public Affairs Officer

⁶ Breast Cancer UK (2019) 'Policy Position Paper: *The Draft Environment (Principles and Governance) Bill*' available at: https://www.breastcanceruk.org.uk/uploads/documents/Breast_Cancer_UK_Environment_Bill_Policy_Paper.pdf (Accessed 14th August 2019)

⁷ HM Government (2018) '*A Green Future: Our 25 Year Plan to Improve the Environment*' available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf (Accessed: 14th August 2019)

⁸ Chemical Watch (2019) '*UK may act faster on post-Brexit restrictions - Minister*' available at: <https://chemicalwatch.com/78453/uk-may-act-faster-on-post-brexit-substance-restrictions-minister> (Accessed: 14th August 2019)

⁹ Environmental Audit Committee (2019) '*Toxic Chemicals in Everyday Life*', 16th July 2019, HC 1805, 2017-2019