

**Professor Chris Whitty,
Chief Medical Officer,
39 Victoria Street,
London,
SQ1H 0EU**

14th July 2021

Dear Professor Chris Whitty,

Roles and Responsibilities of the New Office for Health Promotion

We are writing to congratulate you on the extension of your responsibilities in overseeing the formation of the new Office for Health Promotion (OHP), but also to express our concerns about the scope of the OHP's role in driving the government's prevention agenda.

We welcome the new focus of the OHP to drive improvements in the nation's health by tackling preventable risk factors and putting prevention at the heart of public health policy under your leadershipⁱ. Whilst we support the strategic aims of the OHP, its published remit fails to make any reference to environmental risk factors including the human health impact of exposure to harmful chemicals. This is a missed opportunity to tackle those preventable risk factors which are less likely to be influenced by individual behaviour change.

The Government's pledge to put prevention at the heart of the public health agenda is most welcomeⁱⁱ. However, despite mounting scientific evidence, it is deeply regrettable that neither the responsibilities assigned to the OHP, nor public health and cancer strategies, include any recognition or action plan to reduce public exposure to harmful chemicals.

For years, we have highlighted evidence that public and occupational exposure to harmful chemicals that are carcinogenic, toxic and/or disruptive to the endocrine system (EDCs) is contributing to a significant rise in the incidence rates of many public health conditions. Of notable concern are the following findings:

- The World Health Organisation estimates the disease burden from such chemicals has led to 1.6 million deaths globallyⁱⁱⁱ.
- The UN's Global Chemicals Outlook notes that harmful chemicals such as EDCs are now "ubiquitous in humans and the environment"^{iv}. 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 exposure is estimated at between €109-€157 billion^v
- Throughout our lives we are exposed to a cocktail of chemicals including bisphenols in plastics^{vi}, phthalates in personal care products^{vii}, flame retardants in furniture^{viii}, per and polyfluoroalkyl substances in food packaging^{ix} and toxic pesticides^x.
- Such chemicals, even at low concentrations, can trigger reactions in the body that increase our chances of suffering from chronic and lethal diseases. Examples include hormone-dependent cancers, such as breast and prostate cancers, obesity, diabetes, reproductive problems, developmental effects, and neuro-behavioural difficulties^{xi}.

- The risk from harmful chemicals is often exacerbated when exposure occurs to especially vulnerable groups including infants, children, pregnant women and the most vulnerable, the developing foetus^{xii}.

Accordingly, the OHP and Department of Health (DofH) must recognise that strengthening our knowledge of synthetic chemicals and how they interact with our bodies, represents a core component of disease prevention and will help lead to better health outcomes.

Given the OHP's remit to prioritise prevention and reduce health inequalities, this omission is unacceptable and will weaken our collective battle to prevent ill-health. We believe action now will help reduce the 40% of preventable cancers^{xiii} and meet the World Health Organisation target to lower mortality from non-communicable diseases by 25% by 2025^{xiv}.

To reduce the overall burden of disease, the OHP must acknowledge the public health risks associated with routine exposure to harmful chemicals. Accordingly, we call for urgent policy measures that address the environmental and occupational drivers of disease to be defined within the remit of the OHP before it comes into force in October 2021.

Without the incorporation of such policy measures, the government's approach to prevention remains structurally inadequate. This call for action has been echoed by your predecessor^{xv}, the Environmental Audit Committee^{xvi}, the WHO^{xvii} and the UN Special rapporteur on Toxins^{xviii}. The public too are demanding action. A recent survey found that over 85% of UK respondents are worried about the impact of harmful chemicals in everyday products on human health^{xix}.

Accordingly, we call for the new OHP to:

- Acknowledge the public health risks of routine exposure to low levels of carcinogenic and other harmful chemicals used in everyday products and recognise them as preventable risk factors for cancer and other public health conditions.
- Develop a programme of work that addresses exposure to carcinogenic, harmful and endocrine disrupting chemicals and take necessary steps to reduce public exposure.
- Raise awareness and provide training to Directors of Public Health, Public Health professionals and Clinicians on the health risks of exposure to harmful chemicals.
- Support a cross-governmental approach to chemicals management in collaboration with the Health Security Agency, DEFRA, HSE and DofH to protect the nation's health.

We, the under-signed, believe these actions will complement the Government's prevention objective to ensure that we enjoy five extra years of healthy, independent life by 2035^{xx}.

We welcome the opportunity to meet you and your officials to discuss these proposals further and ask for a formal response on how the OHP intends to address the concerns raised in this letter.

We thank you for your continuing efforts to combat the Covid-19 pandemic!

Yours Sincerely,

Thalie Martini, Chief Executive Breast Cancer UK
 Anna Watson, Head of Advocacy, CHEM Trust
 Kate Metcalfe, Co-Director, Women's Environment Network
 Helen Lynn, Co-ordinator, Alliance for Cancer Prevention
 Jamie Page, Chief Executive, Cancer Prevention and Education Society
 Janet Newsham, Hazards Campaign & Greater Manchester Hazards Centre.
 Jacquie Loughrey, Education and Prevention Officer, Pink Ladies Cancer Support Group
 Nick Mole, Policy Officer, Pesticide Action Network UK
 Joanna Lewis, Policy & Strategy Director, Soil Association
 Deborah Burton, From Pink to Prevention
 Michael Antoniou, Head: Gene Expression and Therapy Group, Kings College London
 Professor Phillipa Darbre, Professor Emeritus (Oncology), University of Reading



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- ⁱ Department of Health & Social Care (2021) [‘New Office for Health Promotion to drive improvement of nation’s health’](#)
- ⁱⁱ Department of Health & Social Care (2018) [‘Prevention is better than cure: Our vision to help you live well for longer’](#) P.2
- ⁱⁱⁱ WHO (2016) [‘The Public Health Impacts of Chemicals: Knowns and Unknowns- Data addendum for 2016’](#) (2018) p.1
- ^{iv} UN Environment Programme (2019) [‘Global Chemicals Outlook II from Legacies to Innovation Solution: Synthesis Report’](#) Implementing the 2030 Agenda for Sustainable Development P.30
- ^v FREIA (2020) [‘Endocrine Disrupting Chemicals \(EDCs\) and Women’s Reproductive Health’](#) P.4
- ^{vi} CHEM Trust (2018) [‘From BPA to BPZ a toxic soup:’ How companies switch from a known hazardous chemicals with similar properties, and how regulators could stop them’](#)
- ^{vii} Breast Cancer UK (2015) [‘Background briefing: Cosmetics & Personal Hygiene products’](#)
- ^{viii} Breast Cancer UK (2017) [‘Flame Retardants: Background briefing’](#)
- ^{ix} Schneider, J, Stakova, J, Cingotti, N (2021) [‘Throwaway Packaging Forever Chemicals, European Wide survey on PFAS in disposable food packing and tableware’](#)
- ^x PAN UK (2021) [‘Impact of pesticides on our health’](#)
- ^{xi} WHO/UNEP (2013) [‘State of the Science of Endocrine Disrupting Chemicals’](#) P.2
- ^{xii} WHO (2014) [‘Identification of risks from exposure to Endocrine-Disrupting Chemicals at the country level’](#) P.17
- ^{xiii} Cancer Research UK (2020) [‘Statistics on Preventable Cancers’](#)
- ^{xiv} WHO (2020) [‘Global Action Plan for the Prevention and control of NCDs 2013-2020’](#)
- ^{xv} Davies. S (2017) [‘Annual Report of the Chief Medical Officer 2017: health impacts of all pollution - what do we know?’](#) P.52.
- ^{xvi} Environmental Audit Committee (2019) ‘Toxic Chemicals in Everyday Life’ 16th July 2019, HC1805. 2017-2019.
- ^{xvii} WHO (2011) [‘Asturias Declaration: A Call to action’](#)
- ^{xviii} United Nations Human Rights Office of the High Commissioner (2020) [‘Special Rapporteurs on the environmentally sound management and disposal of hazardous substances and wastes’](#)
- ^{xix} European Commission (2020) [‘Attitudes of European Citizens towards the Environment’](#) P.45
- ^{xx} Department of Health & Social Care (2019) [‘Advancing our health: prevention in the 2020s’](#)