

Dr Jenny Harries
Chief Executive, UK Health Security Agency
39 Victoria Street,
London,
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14th July 2021

Dear Dr Harries,

Harmful Chemicals: Responsibilities of the New UK Health Security Agency

We warmly congratulate you on your recent appointment as Chief Executive of the new UK Health Security Agency (UKHSA). Given your new position, we are writing to seek urgent clarification on the role and the responsibilities of the UKHSA for monitoring, researching and regulating the effects harmful chemicals can have on the nation's healthⁱ.

We recognise the importance of the UKHSA's broad responsibilities to plan for, prevent and respond to external threats to human health. In addition, we welcome the UKHSA's specific responsibilities to protect the nation from "infectious disease, incidents and outbreaks, and non-infectious environmental hazards such as chemicals and radiation"ⁱⁱ.

For many years, we have been concerned that public exposure to harmful chemicals is contributing to a significant rise in the incidence rates of many public health conditions. Specifically, we would ask you to note that:

- The World Health Organisation estimates that the disease burden from such chemicals has led to 1.6 million deaths globallyⁱⁱⁱ.
- The Lancet Commission concludes that "the effect of chemicals on human health are poorly defined ... and have the potential to cause global epidemics of disease, disability and death"^{iv}.
- The UN's Global Chemicals Outlook notes that harmful chemicals such as EDCs are now "ubiquitous in humans and the environment"^v. We ingest them through food and drink, inhale them in the air we breathe and absorb them through our skin. Unfortunately, many of these chemicals are hazardous to the environment and threaten the health and wellbeing of UK citizens.
- Throughout our daily 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. The risk from harmful chemicals is often exacerbated when exposure occurs to vulnerable groups including infants, children, pregnant women and the most vulnerable, the developing foetus^{xi}.
- Such chemicals, even at low concentrations, and in combination 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^{xii}.

Yet, despite mounting scientific evidence, it is a matter of deep regret that neither public health or cancer plans, include an explicit recognition or action plan to reduce or eliminate public or worker exposure to harmful chemicals in our homes, workplaces and the environment. This omission is unacceptable and weakens our battle to prevent disease.

Public Health England (PHE) has a remit to protect against chemical and environmental hazards^{xiii}, however, it remains unclear how, it has positively impacted the decision-making of Government bodies. Indeed, in recent years, no institution has been formally charged with reviewing the effects of harmful chemicals on human health, and the establishment of the UKHSA is a welcome opportunity to address this void in critical responsibilities.

We therefore call on the new UKHSA to give urgent attention to policy measures that will address the environmental and occupational drivers of disease. This includes monitoring, researching and proposing restrictions on chemicals that are carcinogens, mutagens, toxic to reproduction, immunotoxic, neurotoxic and/or disruptive to the endocrine system (EDCs). Such action has already been recommended by both the former Chief Medical Officer^{xiv} and the Environmental Audit Committee^{xv}.

The UKHSA should, in our view, commit to a programme of work that aims to reduce or eliminate public exposure to harmful chemicals. Additionally, we believe the UKHSA should be given a direct role in advising on future policy decisions once it becomes fully operational in October 2021. This will ensure that the necessary public health expertise is placed at the heart of decision making on harmful chemicals.

We, the under-signed, believe a cross-governmental approach to chemicals management is essential. We call on the UKHSA to work alongside DEFRA, DofH and the Health & Safety Executive to strengthen public protections from harmful chemicals through UK REACH^{xvi} and the forthcoming Chemicals strategy^{xvii}.

Accordingly, we seek the following clarification on the future responsibilities of the UKHSA:

- What specific responsibilities will the UKHSA have to monitor, research and propose appropriate restrictions on specific groups of environmental chemicals?
- How does the UKHSA intend to support the work and decision making of DEFRA, the Health & Safety Executive, the Hazardous Substances Advisory Committee and the Committee on Toxicity, to effectively protect human health from harmful chemicals?
- How will the UKHSA work with the Centre for Radiation, Chemical and Environmental Hazards to monitor levels of toxic chemicals in our environment?
- What arrangements does the UKHSA have in place to engage with stakeholders on the human health effects of environmental chemicals?

We welcome further engagement with you on these issues and ask for a formal response on how the UKHSA intends to address exposure to harmful chemicals as part of its strategic priorities to protect the nation's health and support a non-toxic environment.

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 for Health & Social Care (2021) "[Letter from Lord Bethell to Dr Jenny Harries, UKHSA Chief Executive](#)"
- ⁱⁱ Department of Health & Social Care (2021) "[Transforming the public health system: reforming the public health system for the challenges of our times](#)"
- ⁱⁱⁱ WHO (2016) "[The Public Health Impacts of Chemicals: Knowns and Unknowns- Data addendum for 2016](#)" (2018) p.1
- ^{iv} The Lancet, [The Lancet Commission on pollution and health](#) (2017), p 480.
- ^v UN Environment Programme (2019) "[Global Chemicals Outlook II from Legacies to Innovation Solution: Synthesis Report](#)" Implementing the 2030 Agenda for Sustainable Development P.30
- ^{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 (2014) "[Identification of risks from exposure to Endocrine-Disrupting Chemicals at the country level](#)" P.17
- ^{xii} WHO/UNEP (2013) "[State of the Science of Endocrine Disrupting Chemicals](#)" P.2
- ^{xiii} Department for Health & Social Care (2020) "[Letter from Public Health Minister Jo Churchill MP to Chief Executive Duncan Selbie on Public Health England Strategic Remit and Priorities](#)"
- ^{xiv} Davies. S (2017) "[Annual Report of the Chief Medical Officer 2017: health impacts of all pollution - what do we know?](#)" P.52.
- ^{xv} Environmental Audit Committee (2019) 'Toxic Chemicals in Everyday Life' 16th July 2019, HC1805. 2017-2019
- ^{xvi} HSE (2021) "[The Agency for UK REACH work programme 2021/22](#)", June 2021
- ^{xvii} Department for Environment, Food and Rural Affairs (2018) "[A Green Future: Our 25 Year Plan to improve our Environment](#)" P.100