

Case for urgent, group-based regulation to prevent continued PFAS pollution in the UK environment

To:

Rt Hon George Eustice MP, Secretary of State for Environment, Food & Rural Affairs
Jo Churchill MP, Minister for Agri-Innovation and Climate Adaptation

And:

Rt Hon Philip Dunne MP, Chair, Environmental Audit Committee;
Rt Hon Jeremy Hunt MP, Chair, Health Select Committee
Lord Callanan, Parliamentary Under Secretary of State

27 May 2022

Dear Secretary of State and Minister Churchill,

As NGOs representing public interest across health and environment, we are extremely concerned about the threats widespread pollution from per- and polyfluorinated alkyl substances (PFAS) pose to human health and the environment. In the enclosed joint statement signed by 30 civil society organisations, we are calling on the UK Governments to urgently ban all unnecessary uses of all 'forever chemicals', PFAS.

We welcome the initiative from the UK, Welsh and Scottish Governments to assess the regulation of PFAS through a regulatory management options analysis (RMOA). This presents an opportunity for the UK to take world-leading action by restricting the production and use of all PFAS chemicals as one group under UK REACH by 2025.

There is now clear and unequivocal evidence that demonstrates global contamination of the environment, wildlife and human populations by PFAS. Due to their extreme persistence, mobility and widespread use, the entire PFAS group poses an unacceptable risk to wildlife, human health and the wider environment.

In the statement we present some of the evidence, which shows that PFAS are accumulating in our bodies and those of our children, and that PFAS exposure poses an immediate threat to human health. The statement also details how PFAS pollution is fuelling the biodiversity crisis, threatening drinking water sources in the UK and creating a barrier to a safe and effective circular economy.

PFAS-free solutions already exist, yet PFAS continue to be added unnecessarily to many consumer products, highlighting the need for clear and ambitious legislative action that will solve this growing pollution problem and safeguard the environment for future generations.

Past attempts to regulate PFAS chemicals individually have proved insufficient in preventing pollution in any meaningful way. Regulating PFAS in multiple small groups would represent a similarly piecemeal

approach, ignoring growing evidence of collective risk across the full chemical group and undermining the voluntary efforts already underway across various UK retail and industry sectors.

The only way to effectively prevent PFAS pollution in the UK environment, and to protect future generations from the impact of the most persistent human-made chemicals known to date, is to implement an urgent and timelined phase-out of all unnecessary uses of all PFAS.

We strongly urge the UK Governments to take this opportunity to implement stringent, group-based legislation, to eliminate all unnecessary sources of these harmful chemicals, and to drive innovation towards safer and greener alternatives.

We welcome further engagement on this issue and look forward to your response.

Yours sincerely,

Dr Richard Benwell, Chief Executive Officer, Wildlife and Countryside Link

Sandy Luk, Chief Executive Officer, Marine Conservation Society

Dr Michael Warhurst, Executive Director, CHEM Trust

Thalie Martini, Chief Executive Officer, Breast Cancer UK

Catherine Gunby, Executive Director, Fidra

Prashant Vaze, Director and Treasurer, Green House Think Tank

Susan Davies, Chief Executive Officer, Scottish Seabird Centre

Janet Newsham, Chair, Hazard Campaign, and Coordinator, Greater Manchester Hazard Centre

Jacquie Loughrey, Education and Prevention Officer, Pink Ladies Cancer Support Group

Nick Measham, Chief Executive Officer, Salmon & Trout Conservation

Chris Butler-Stroud, Chief Executive Officer, Whale and Dolphin Conservation

Dr Rob Collins, Director Policy and Science, The Rivers Trust

Shaun Spiers, Executive Director, Green Alliance

Phoebe Clay, Director, Unchecked UK

Kate Metcalfe, Co-Director, Women's Environment Network

Jamie Page, Chief Executive, Cancer Prevention

Emily Kerr Muir, Director, Savitri Trust

Rob Percival, Head of Policy, Food and Health, Soil Association

Helen Lynn, Director, Alliance for Cancer Prevention

Keith Tyrell, Chief Executive, PAN UK

Talia Goldman & Matt Williams, Co-Directors, UK Youth for Nature

Matt Shardlow, Chief Executive, Buglife

Steve Head, Coordinator of the Wildlife and Gardening Forum

Mark Owen, Head of Freshwater, Angling Trust

Joan Edwards, Director of Policy & Public Affairs, The Wildlife Trusts

Dr James Robinson, Director of Conservation, Wildfowl & Wetlands Trust