

Brussels, 14 December 2012

Dear Minister,

Re: EC Proposal for a Directive regarding priority substances in the field of water policy, COM (2011) 876

Ahead of the EU Environment Council Meeting on Monday 17th December, Health Care Without Harm (HCWH) Europe would like to share with you its view on one important issue on the agenda of the meeting: **priority substances and environmental quality standards in the field of water.**

HCWH Europe¹ welcomes the Commission's legislative proposal² to add 15 new chemicals to a list of 33 identified hazardous chemicals ("priority substances list") and to set safe concentration limits in water (environmental quality standards – EQS) for them. Three of these new substances are pharmaceuticals: two oestrogen chemicals used in contraceptive pills and an anti-inflammatory chemical used in painkillers³.

This is the first time that a European Commission's proposal introduces a legally binding obligation to phase out emissions of certain chemicals by a given deadline applying the precautionary principle to the control of chemicals. Unfortunately, the European Parliament's Committee for Environment, Public Health and Food Safety has weekend the Commission's proposal by failing to support the setting of EQS for the three proposed pharmaceuticals.

HCWH Europe with this letter would like to call on you and the other EU Environment Ministers to ensure that pharmaceutical residues are controlled in water without any further delay, by supporting the setting of EQS for the three proposed pharmaceuticals. Failing this, a mechanism for controlling pharmaceutical residues in water, responsible for causing adverse effect on the environment and human health, might come into place in European Member States as far as in 2027.

It has been widely documented that pharmaceuticals cause detrimental effects on freshwater ecosystems, affecting birds and mammals, including humans via secondary poisoning. In particular, adverse effects on sexual development and reproductive system of fishes have been documented for the two oestrogen chemicals and diclofenac has been shown to be toxic, both directly and indirectly, to a variety of vertebrate species⁴. These studies are supported by a report from the German Environment Agency, which identifies 24 pharmaceuticals for urgent action as they pose significant risk to the health of freshwater ecosystems⁵. In addition, it is important to respect the scientific integrity of the proposal: the Commission's proposal was backed by a solid body of research and, as part of this prioritisation exercise, more than 2000 substances, all of which pose a risk to aquatic ecosystems, were screened but, mainly because of lack of monitoring data across EU Member States, only 15 substances were prioritized for action at EU level.

¹ Health Care Without Harm (HCWH) is an international coalition of hospitals and healthcare systems, medical professionals, health-affected constituencies, labour unions, and environmental and health organisations. HCWH has four regional offices: in Europe, United States, Latin America and Asia-Pacific, and counts 514 members in over 53 countries worldwide. HCWH mission is to transform the healthcare sector worldwide so that it becomes environmentally and ethically sustainable and no longer a source of harm to the environment and human health. HCWH Europe includes 70 members in 24 European countries (WHO Euro-region), of which 16 are part of the European Union.

² Proposal for a Directive amending the WFD and EQSD (COM(2011)876): http://ec.europa.eu/environment/water/water-dangersub/pri_substances.htm#prop_2011

³ The three pharmaceutical substances to be included in the priority substances list are: 17-alpha-ethinylestradiol (EE2) and 17-beta-estradiol (EE) and diclofenac.

⁴ EEA Technical report No 1 (2010): *Pharmaceuticals in the Environment*: <http://www.eea.europa.eu/publications/pharmaceuticals-in-the-environment-result-of-an-eea-workshop>

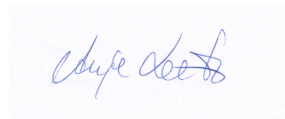
⁵ http://www.umweltbundesamt.de/uba-info-presse-e/2012/pe12-007_painkillers_contaminate_germanys_waterbodies.htm and

The debate so far has focused solely on costly end-of-pipe solutions for filtering out pharmaceutical residues in water and has not sufficiently considered upstream measures that are already in use in some Member States (MS). For example, the collection scheme for unused and expired pharmaceuticals is a requirement in all MS, the classification of pharmaceutical substances according to their persistent, bio-accumulative and toxic properties is now common practice in Sweden and has encouraged the pharmaceutical industry in Sweden to focus on green chemistry and shift to chemicals that, as far as possible, are fully metabolized in the body and rapidly biodegrade in the environment into harmless compounds⁶. Sweden has also been successful in producing the 'wise list'⁷ a publication that lists the least environmentally hazardous medicines on the market and educates healthcare professionals to optimise medicines prescription behaviour so that only the right amount of pharmaceuticals needed is prescribed, giving priority to the least environmentally hazardous ones. In Sweden 80% of doctors use the wise list.

We therefore invite you to take our concerns into consideration at the forthcoming EU Environment Council meeting and to secure the setting of EQS for the three pharmaceuticals that have been included in the priority substances list, supporting the Commission's proposal and sending the message that pharmaceutical residues in water need to be tackled NOW!

Thank you very much for your consideration.

Yours sincerely,



Anja Leetz
Executive Director
Health Care Without Harm Europe

⁶ http://www.janusinfo.se/Global/Miljo_och_lakemedel/miljobroschyr_2011_uppslag_eng.pdf

⁷ http://www.janusinfo.se/Global/In_English/wise_list_meet_2012/background_information.pdf