**Contribution from EDC-Free Europe to the questionnaire for the report and meeting of the Human Rights Council on the topic “*Realizing children’s rights through a healthy environment*”.**

The EDC-Free Europe Coalition brings together public interest groups representing 70 environmental, health, women’s and consumer groups across Europe who share a concern about hormone disrupting chemicals (EDCs) and their impact on our health and wildlife. Visit us on [www.edc-free-europe.org](http://www.edc-free-europe.org/).

**Consultation questions:**

**1. Please share any information or evidence on the impact of environmental degradation, pollution or childhood exposure to hazardous substances on children’s rights, including the right to health.**

Current reports and evidence show the extent to which children’s rights to health and to a healthy environment can be compromised by exposure to EDCs during pregnancy and/or childhood:

* “*pregnancy and early postnatal life (infants and toddlers) are exceedingly sensitive periods for ED exposure [88]. This is not surprising, given the fact that it is during these periods (especially early pregnancy) that all the organs (brain, liver, muscles, skeleton) are formed and that certain endocrine feedback mechanisms are not yet mature [89].* […]

*Several lines of evidence show that many childhood and adult diseases, including cardiovascular disease, obesity and metabolic disorders including type-2 diabetes, certain reproductive cancers, neurodevelopmental disease and IQ loss, are consequences of ED exposure during pregnancy [89]. Even though there is less data on childhood and adolescence, given their marked dependence on the endocrine system, adverse ED effects are suspected, and have been documented on animal models [90] and in epidemiological studies[91, 92]*. *What is more, during pregnancy, not only are the mother and the foetus exposed, but also the next generation via the germinal cells (the eggs and the sperm) that are forming in the unborn child (Figure 10)* » p.30 Endocrine Disruptors: From Scientific Evidence to Human Health Protection, Study for the PETITION of Committee European Parliament May 2019 <https://www.europarl.europa.eu/RegData/etudes/STUD/2019/608866/IPOL_STU(2019)608866_EN.pdf>

* 2019 HEAL TEDX -infographic series on EDCs to highlight EDCs effects on children’s health– available in 3 languages <https://www.env-health.org/infographic-low-doses-matter/>
* In 2015 over 100 national societies of obstetricians and gynaecologists from around the world called on policymakers to prioritise reducing exposures as an important means of disease prevention <https://www.figo.org/sites/default/files/uploads/News/Final%20PDF_8462.pdf>.
* **European research project EDC-MixRisk highlights that health risks associated with the combined exposures to EDCs are systematically underestimated under current assessment methods in the European Union** <https://edcmixrisk.ki.se/2019/03/26/press-release-health-risks-associated-with-mixtures-of-man-made-chemicals-are-underestimated/>
* EDCs throughout your day BEUC (The European consumer organisation) June 2019 <https://www.beuc.eu/publications/beuc-x-2019-037_endocrine_disruptors_throughout_your_day.pdf>
* WHO/UNEP *State of the Science of Endocrine Disrupting Chemicals*, 2012 <https://www.who.int/ceh/publications/endocrine/en/> and UNEP IPCP, An overview of current scientific knowledge on the life cycles, environmental exposures, and environmental effects of select endocrine disrupting chemicals (EDCs) and potential EDCs, July 2017 <https://wedocs.unep.org/bitstream/handle/20.500.11822/25634/edc_report2.pdf?sequence=1&isAllowed=y>
* Report highlighting how chemicals in food and consumer products used in homes, schools and offices could harm brain development in children. *CHEM Trust:* [*No Brainer: The impact of chemicals on children’s brain development: a cause for concern and a need for action,* 2017 *.*](http://www.chemtrust.org/wp-content/uploads/chemtrust-nobrainer-mar17.pdf)<https://chemtrust.org/brain/> and <https://www.env-health.org/book-review-toxic-cocktail-how-chemical-pollution-is-poisoning-our-brains/>
* «Global survey: Recycling contaminates plastic children’s toys with toxic chemicals from electronic waste » by Arnika and WECF, April 2017 <http://www.wecf.eu/english/articles/2017/04/toxic-toys.php>
* Case of extended use of chlordecone pesticide in France overseas territories (Guadeloupe and Martinique and impact on children) <https://www.huffingtonpost.fr/2018/02/13/le-chlordecone-ce-pesticide-bombe-a-retardement-de-la-martinique-pour-20-generations_a_23354147/>.
* [*Toxic Loophole – Recycling Hazardous Waste Into New Products*](https://www.env-health.org/european-study-exposing-toxic-e-waste-chemicals-in-childrens-products-spurs-calls-for-policy-to-end-recycling-exemptions-for-hazardous-waste-2/) ,October 2018– IPEN, HEAL and Arnika report presents new evidence that toxic brominated flame retardants, hazardous chemicals from electronic waste that are known to disrupt thyroid function and cause neurological and attention deficits in children, are contaminating recycled plastics in consumer products across Europe. The study, an analysis of 430 plastic children’s toys, hair accessories, and kitchen utensils purchased in 19 European countries, showed that 109 (25%) had elevated levels of bromine, indicating potential presence of a brominated flame retardant. The 109 samples were further analysed for concentrations of specific brominated flame retardant chemicals, which showed that 50 of these (46%) would fail to meet the EU POPs Regulation, where the product was composed of new rather than recycled plastic. The Executive Summary is available in 4 languages [Dutch](https://www.env-health.org/wp-content/uploads/2018/10/Toxic_Loophole_brochure_nl.pdf), [English](https://english.arnika.org/publications/download/290_9ed34ddfb6ecf770dc4d3170c93d82ac), [French](https://www.env-health.org/wp-content/uploads/2018/10/Toxic_Loophole_brochure_fr-v2.pdf) and [German](https://www.env-health.org/wp-content/uploads/2018/10/Broschu%CC%88re_Giftiges-Recycing_final-2.pdf), and the PR available for [EU’s institutionnal audiences](https://www.env-health.org/european-study-exposing-toxic-e-waste-chemicals-in-childrens-products-spurs-calls-for-policy-to-end-recycling-exemptions-for-hazardous-waste-2/) , [France](https://www.env-health.org/wp-content/uploads/2018/10/16102018-Press-release-France-HEAL-WECF-FNE.pdf), [Belgium](https://www.env-health.org/wp-content/uploads/2018/10/18102018-Toxic-Loopholes-press-release-Belgium-IEW-HEAL-.pdf) and the [Netherlands](https://www.env-health.org/wp-content/uploads/2018/10/16102018-Press-release-Netherlands-Belgium-HEAL.pdf)**.**
* [***Detoxing Carpets – Pathways towards safe and recyclable carpet in a truly circular economy***](https://www.env-health.org/wp-content/uploads/2018/06/detoxing-carpets_EN.compressed.pdf)5th March 2018 - HEAL, together with its member organization EPHA, published a briefing reflecting the findings of a new report revealing toxic substances in European carpets can be linked to a range of adverse health impacts, highlighting the impact on children’s health. The study identifies over 59 hazardous substances in carpets sold in the EU. This launch was supported with a press release, covered in 37 media outlets across **Belgium**, Germany, France, the Netherlands, Armenia and European-wide platforms.
* [***Testing for Toxics***](https://www.env-health.org/toxic-chemicals-found-in-carpets-sold-by-major-european-manufacturers/)HEAL co-published a follow up investigation showing that toxic chemicals are present in carpets produced and sold by some of the largest carpet manufacturers on the European market.HEAL also co-authored a European study exposing toxic e-waste chemicals in children’s products spurs calling for policy to end recycling exemptions for hazardous waste. This includes 1 [infographic](https://www.env-health.org/wp-content/uploads/2018/10/CM-substances-in-carpets-ENGLISH-01.jpg) on toxic chemicals detected in carpets, including development disorders, and their potential health impacts, and a [video](https://www.youtube.com/watch?v=q-KdYngZ7O4) explaining findings of the report.
* Tests on consumer good undertaken by different NGOs illustrate the widespread exposure of children, parents, future parents and future children (see transgenerational effects above) to EDCs
  + *EDCs throughout your day BEUC* (The European consumer organisation) June 2019 <https://www.beuc.eu/publications/beuc-x-2019-037_endocrine_disruptors_throughout_your_day.pdf>
  + Danish Consumer Council THINK Chemicals; for example “*KEMI 6 plastic balls notified for content of endocrine disruptor*s”, July 2018 <https://kemi.taenk.dk/bliv-groennere/6-plastic-balls-notified-content-endocrine-disruptors>; Body lotions may contain endocrine disrupting chemicals and allergic perfumes <https://kemi.taenk.dk/bliv-groennere/test-body-lotions-may-contain-endocrine-disrupting-chemicals-and-allergenic-perfume>.
  + *Contamination of surface waters by EDCs in France*, EXPPERT report No. 11 Generations Futures April 2019 <https://www.edc-free-europe.org/articles/reports/new-report-highlights-widespread-presence-suspected-endocrine-disrupting-pesticides>
  + Concerns over plastic used in schools restaurants and kinder garden catering Sept 2018<https://www.universite-paris-saclay.fr/en/news/plastic-in-canteens-an-unacceptable-danger-to-our-childrens-health>

The reports presented above also illustrate, as outlined by the Childs Right International Network (CRIN), how also children’s rights to play or to education are affected by the health impacts of EDCs <https://home.crin.org/latest-edcfree-article>.

2. Please identify noteworthy and globally significant examples **of good practice towards ensuring children’s rights through a healthy environment, including good practices to mitigate childhood exposures to harmful levels of air pollution and hazardous substances, such as pesticides or other toxic chemicals.**

EDCs are ubiquitous in adults and children’s life. Avoiding them or reducing exposure requires robust and comprehensive policy strategies and legislations. The updating of the 1999 European Strategy on EDCs is long overdue. The European Commission was required to come up by 2018 with a Strategy for a Non Toxic Environment but has failed so far to deliver it. After much delays, the European Commission launched in 2018 a process to set up a “Comprehensive EU Framework on Endocrine Disruptors”. There is no timeline nor action plan in this proposal so it is unclear as to when there will be a new EU strategy on EDCs based on the latest state of scientific knowledge on EDCs and when key EU legislation such as legislation on toys, food contact materials or cosmetics will be adequately up graded. In the meantime, some EU Member states are taking action to set up national strategies on EDCs.

* Belgium – Information report on EDCs, including recommendations, Belgium Senate March 2018 – including right to health que <https://www.senate.be/informatieverslagen/6-303/Senat_rapport_perturbateurs_endocriniens-2018.pdf>
* Denmark: Knowledge Center on endocrine disrupting chemicals set up in 2008: interdisciplinary scientific network whose purpose is to gather and share knowledge about endocrine disrupting chemicals <http://www.cend.dk/index.html> as part of the Danish Strategy on EDCs set up in 2002
* France: 2nd national strategy on EDCs September 2019 – strategic objective 1 on training and information; strategic objective 2 on protection of the population ; focus on vulnerable groups for both objectives <https://solidarites-sante.gouv.fr/actualites/presse/communiques-de-presse/article/perturbateurs-endocriniens> and see information web site for parents <https://agir-pour-bebe.fr/>
* Sweden – Strategy for a non-toxic environment – up dated with 2019 report of EPA <https://www.kemi.se/global/rapporter/2019/rapport-2-19-fordjupad-utvardering-av-giftfri-miljo-2019.pdf>
* Green Public Procurement policies to prevent the purchase of products with harmful chemicals such as phatalates and bisphenol A are in place in Sweden and Denmark. They also concern schools, kindergardens etc see report “Measures against Endocrine Disrupting Chemicals, the Example of Denmark, Sweden and France; WEMOS, WECF, PAN Europe, June 2016 <https://www.wemos.nl/wp-content/uploads/2016/06/Measures_against_endocrine_disrupting_chemicals_June2016.pdf>.

**3. What legal and other measures are in place to ensure that the activities of companies do not damage the environment, either domestically or in other countries?**

* To a certain extent, at EU level REACH Regulation, and other sectoral regulations on pesticides, on biocides, on freshwater; “UNEP - Existing national, regional, and global regulatory frameworks addressing Endocrine Disrupting Chemicals (EDCs), July 2017 <https://wedocs.unep.org/bitstream/handle/20.500.11822/25636/edc_report3.pdf?sequence=1&isAllowed=y> ; see Highlight and summary p.6 and p.14 for the EU.

a. What are the main gaps and challenges experienced in this regard?

* Absence of an up dated EU strategy on EDCs, See EDC Free Europe “Eight demands for an EU EDC strategy” May 2018, <https://www.edc-free-europe.org/articles/position-papers/eight-demands-edc-strategy>, ; European Parliament resolution “A comprehensive EU framework on EDCs” April 2019 <https://www.europarl.europa.eu/doceo/document/TA-8-2019-0441_EN.html> and EDC Free Europe comment <https://www.edc-free-europe.org/articles/press-release/eu-parliament-calls-on-commission-to-get-rid-of-edcs>; Conclusions of EU Environment Ministers June 2019 <https://www.consilium.europa.eu/en/press/press-releases/2019/06/26/council-conclusions-on-chemicals/> and EDC Free Europe comment
* “The REACH regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals lists only two endocrine disruptors on the list of substances requiring a special authorisation, while 4 phthalates are proposed to be banned, 13 substances are candidates to be included in the authorisation list, and 80 substances are being evaluated.« Why the next European Commission has to take action on endocrine disruptors”, IEEP July 2019 <https://ieep.eu/news/why-the-next-european-commission-has-to-take-action-on-endocrine-disruptors> ; an up dating process of the REACH annexes to support identification requirement for EDCs has been initiated in Summer 2019.
* “Lack of EU harmonised rules on many food contact materials and other holes in the system – including the continued use of substances of very high concern in food packaging – means that public health is not properly protected”, ChemTrust 2019 .<https://chemtrust.org/food-contact/>

4. Please provide information on national laws and policies to ensure that companies undertake environmental and human rights due diligence and do not contribute to abuses of children’s rights.

a. What measures are in place to combat hazardous forms of child labour in which children are at particular risk of exposure to hazardous and toxic substances?

* “[REACH 2018 - Call to action! Joint OSHA/ECHA/ETUC Campaign for workers' reps](https://www.etuc.org/en/publication/reach-2018-call-action-joint-oshaechaetuc-campaign-workers-reps)” <https://www.etuc.org/en/issue/reach>

5. What measures are in place to fulfill children’s right to participate and be heard in decisions affecting their rights and environment, including their right to remedy in the case of violations of their rights linked to pollution or exposures to hazardous substances?

**6. How are environmental risks to children being monitored and measured in your country?**

Human biomonitoring for the EU HBM4EU – including EDCs – 28 countries<https://www.hbm4eu.eu/the-project/>

**Other monitoring and survey include:**

**Denmark**

« Aarhuus Birth Cohort Biobank. This project, which started in 2008, examines the development of the foetal hormonal system in relation to exposure to harmful chemicals.28 To date, 11,500 families have been included in the study. The project is funded by the Danish Council for Independent Research, the Danish Council for Strategic Research, and a number of private individuals. » p.10 <https://www.wemos.nl/wp-content/uploads/2016/06/Measures_against_endocrine_disrupting_chemicals_June2016.pdf>

**France – Biomonitoring surveys**

First results of Esteban survey September 2019: set up to measure the presence of environmental pollutants in the human body, including EDCs; conducted on a representative sample of the French general population of 1104 children and 2503 adults. The first results published in September 2019 regarding the presence of a selection of EDC and carcinogenic chemicals show that these pollutants are present in the body of all adults and children, with higher levels of impregnation found in children. <https://www.santepubliquefrance.fr/presse/2019/polluants-du-quotidien-donnees-inedites-chez-les-enfants-et-les-adultes>

[ELFE (Etude longitudinale française depuis l’enfance) child cohort study](http://www.elfe-france.fr/index.php/en/)  initiated in 2011, coordinated by the Ined-Inserm-EFS Elfe joint research unit: it currently monitors 20,000 children, born in 2011. Its main objective is to **study the environmental and social decisive factors which can impact child health and development, from the *in utero* stage to adolescence**. One phase of this study allowed biological samples to be collected from 8,000 mothers. These could help identify possible correlations between a health event and contamination with endocrine disruptors***in utero***. Information from INSERM <https://www.inserm.fr/en/health-information/health-and-research-from-z/endocrine-disruptors>

[The PELAGIE (Perturbateurs endocriniens : étude longitudinale sur les anomalies de la grossesse, l’infertilité et l’enfance - Endocrine Disruptors: Longitudinal Study on Disorders of Pregnancy, Infertility and Children) cohort](http://www.pelagie-inserm.fr/) has been monitoring 3,500 mother-child pairs living in Brittany, since 2002. It aims to**study the impact of environmental contaminants on in utero then infant development**.

**France – specific survey in Martinique and Guadeloupe re. impact of Chlordecone pesticides on children** –March 2019 Section on child development in <https://www.irset.org/etudes-destinees-identifier-les-dangers-et-risques-sanitaires-associes-lexposition-au-chlordecone> « Les enfants nés de la cohorte Timoun ont fait l’objet d’un suivi longitudinal jusqu’à l’âge de 7 ans et qui se poursuit actuellement à l’âge péri-pubertaire ». […] « A l’âge de 7 mois, l’exposition prénatale au chlordécone a été retrouvée associée de manière significative à une réduction du score de préférence visuelle pour la nouveauté ainsi qu’à un plus faible score sur l’échelle du développement de la motricité fine [[7](https://www.ncbi.nlm.nih.gov/pubmed/22910562)] ». « *A l’âge de 18 mois, l’exposition prénatale au chlordécone a été retrouvée associée de manière significative à une réduction du score sur l’échelle du développement de la motricité fine [*[*8*](https://www.ncbi.nlm.nih.gov/pubmed/23376090)*]. Une analyse stratifiée par sexe a montré que cette association est restreinte aux enfants de sexe masculin*. »

**Survey and tests undertaken by NGOs, such as those mentioned on page 1 and:**

* **Générations Futures, in partnership with HEAL and PAN-Europe EXPPERT survey 7 on a breakfast food, muesli,**<https://www.edc-free-europe.org/articles/test-results/do-breakfast-cereals-contain-endocrine-disruptors>
* France «23 to 54 substances believed to be endocrine disruptors found in children’s hair”; April 2017 <https://www.60millions-mag.com/2017/04/20/cocktail-de-produits-toxiques-dans-les-cheveux-de-nos-enfants-11105>
* Pesticides that are banned or suspected to be EDCs are found in green salads, Sept 2015 <https://www.edc-free-europe.org/articles/test-results/pesticides-that-are-banned-or-suspected-to-be-edcs-are-found-in-green-salads>
* See <https://www.edc-free-europe.org/science-legislation/test-results>