



BRUSSELS, 22 MAY 2024

Dear Minister

You are currently considering draft Council Conclusions on the EU's Environment Action Programme (8EAP) for adoption at the June Environment Council.

The Health and Environment Alliance (HEAL), an alliance of over 80 member organisations, has been engaged in the policy development and implementation of the 8 EAP, and previous EAPs. We consider the programme a key policy instrument that sets the framework for EU environmental policy until 2030 and we support the development of a 9EAP for the post-2030 period.

HEAL is highly concerned about the recent [EEA findings](#) that the EU is off track to meet the majority of the 2030 8EAP targets, resulting in health impacts and costs which are preventable.

We call on you to step up in taking measures to implement the 8EAP objectives, recognising the [urgency to act for health](#) on the multiple crises including those from global heating, environmental pollution and biodiversity loss. Such strengthened action is also essential to uphold and deliver on your commitments from the 2023 [Declaration of the Seventh Ministerial Conference](#) on Environment and Health, adopted by the countries of the World Health Organization European Region.

We also urge you to underline the importance of protecting health from the triple crises of climate change, environmental pollution and biodiversity loss with your Heads of State, for prioritisation in the [EU strategic agenda](#).

For the Environment Council Conclusions, we invite you to consider the following points:

1. Place health at the center of EU climate action and end fossil fuel subsidies

As the recent 2024 reports from the [Lancet Countdown Europe](#) and the [EUCRA](#) underline, people's health across the EU (and the wider European region of 52 countries) is under major threat from climate change. The health impact and cost of the EU's climate inaction are already too high, with 61,000 people dying from heat in the summer of 2022.

Health protection needs to be at the [centre of the EU's climate mitigation and adaptation agenda](#), with measures that protect especially those most vulnerable to the consequences of climate change.

The burning of fossil fuels is the major driver of climate change, yet there are currently no plans nor a deadline to phase out subsidies for fossil fuels. As the EEA data shows, fuel subsidies increased in 2022 and more than 60% of all fossil fuel subsidies granted in that year were spent in three EU founding member states (Germany, Italy and France). This continued subsidising of fossil fuels risks the EU not achieving the 2050 climate neutrality goal and undermines the bloc's credibility as a global leader on climate action.

2. Tackle health harm from air pollution inequalities

Air pollution is the top environmental risk factor for health in the EU, but action for clean air at member state level has been slow and unambitious, leading to significant health impacts and cost which are largely preventable.

Given the [urgency to act](#), HEAL considers it necessary that an ambitious, health protective framework is adopted, and a swift date for the full alignment of EU clean air standards with WHO recommendations is set. The AAQD trilogue deal, which was confirmed by the European Parliament on 24 April is a major step forward for better health.

HEAL urges you to follow suit and approve the Council deal without delay, so that transposition into national law can start and people's health can be better protected.

An ambitious transposition of the AAQD at national level, beyond the minimum requirements set in the new directive, would help achieve the 8 EAP goal of reducing air pollution exposure disparities, for which the EEA considers there is insufficient progress on.

3. Act swiftly on reducing health harm from hazardous chemicals and pesticides

The health burden from hazardous chemicals is unacceptably high and keeps growing. The [European Human Biomonitoring Programme](#) concluded in 2022 that the European population is exposed to alarmingly high levels of hazardous chemicals, in particular children.

Preventing the fast-rising rate of non-communicable diseases, including breast cancer and prostate cancer, obesity and diabetes as well as infertility and learning disorders, requires urgent improvements in EU laws.

HEAL considers it paramount that chemicals management and reducing the health harm from chemicals continues to be a [priority of action for the EU and member states](#) and calls for progress on chemicals management to be monitored as part of the 8 EAP indicators, including reduction and exposure of pesticides. HEAL calls on you to renew your commitment for the full implementation of the Chemicals Strategy for Sustainability, and to double down on upgrading EU chemicals regulatory framework and phase out of the most harmful chemicals. This includes especially going forward with a health protective update of the EU chemicals law REACH, the swift restriction of harmful substances such as endocrine disruptors and PFAS, and taking further efforts for pesticide reduction.

We would be happy to respond to any questions you may have.

Yours sincerely,



Genon K. Jensen
Executive Director
Health and Environment Alliance (HEAL)

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 80 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

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