

Dear Environment and Health Ministers,

We welcome the *Council Conclusions on the Mid Term Review of the EU Environment and Health Action Plan 2004-2010*, and acknowledge the work towards prioritizing this, particularly from the EU Portuguese Presidency. As an organisation working to advocate better protection of the environment as a means to improve the health and well being of people living in Europe, HEAL and its some 50 member organisations support many of the sentiments and directions clearly laid out in the conclusions, particularly the call for more effort to be placed on resource allocations across a wide variety of sectors to ensure definitive actions that will protect those most vulnerable.

One of the key areas to move forward the environmental health agenda is **supporting the development of an EU coordinated human biomonitoring system through an EU pilot project**. We applaud the commitment to doing this in the conclusions, and call on member states and the European Commission to ensure that there are financial resources to make this happen. Integration of environment and health information systems, with human biomonitoring at its heart, would ensure better public health interventions and more effective monitoring of EU decision making.

We also welcome the call in the conclusions for the Commission and member states "to continue developing a **comprehensive environment and health information system** to identify hazards, set planning priorities and measure progress and changes in the environmental quality and health status, in order to facilitate cross-border comparisons and evaluation of policies" and the new initiatives for member states to submit environment and health progress reports by 2009 in order to compile a European report in 2010. **To increase the usefulness and awareness of such reports, we would request that the reports be prepared with the active involvement of national civil society groups as part of implementing the Aarhus Convention provisions on public participation.** 

The proposal to develop an **environment and health related problems database** is also welcomed, and we believe could be a tangible contribution to an EU integrated environment and health monitoring system.

With regards to EU action on Indoor Air Quality, we welcome the attention on the need to consolidate existing guidelines, and would go further, requesting that the Commission publishes a White Paper or Staff Working Paper on options for EU added-value on improving indoor air quality.

In conclusion, we would like to draw your attention to the some of the environmental health challenges raised during the 6<sup>th</sup> 'Environment for Europe' conference earlier this year listed below:

- Major environment-related health concerns in the pan-European region continue to be linked to poor air and water quality, hazardous chemicals, and noise. These are often interconnected through common driving forces or pressures.
- The burden of ill health attributable to environmental causes is much higher in EECCA and SEE than in WCE. One reason for this is the coexistence and combination of 'traditional' (e.g. unsafe water and sanitation) and 'modern' (e.g. urban air pollution, chemicals) hazards.
- Responses to environment-related health challenges in Europe at the international, regional and national level are improving. International action plans focus on children's health and reducing the burden of environment-related health problems in this vulnerable group. However, for many health hazards, actions lag well behind policies.
- The health toll of natural disasters such as violent storms, floods, heat waves, landslides and droughts is being exacerbated by urbanisation, deforestation and climate change, and lack of preparedness.
- Although cause and effect relationships are hard to establish, there appear to be a number of associations between outdoor and indoor air pollution, water and soil contamination, hazardous chemicals and noise and respiratory and cardiovascular diseases, cancer, asthma, allergies, as well as disorders of reproductive and neurodevelopmental systems.
- There is growing concern about adverse impacts of exposures to low levels of chemicals, often in complex mixtures. Several adult diseases are suggested to be linked to exposure in very early childhood or exposure of parents before conception. Persistent chemicals with long-term effects, and those used in long-life articles, may present risks even after their production as been phased out.
- Human health impacts of soil degradation across Europe are currently difficult to estimate. Efforts to achieve the sustainable use of soil will also have positive impacts on human health and quality of life.

We believe the EU Action Plan should and could provide the framework for identifying and implementing solutions to address these concerns, and call on you to **ensure that DG Environment, as lead DG on this file, had adequate financial and human resources to coordinate** and continue this overarching work.

Sincerely,

Genon K. Jensen Executive Director

Health and Environment Alliance (HEAL)