
The Rt Hon Michael Gove MP
Defra
Nobel House
17 Smith Square
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28 July 2017

Dear Minister,

On behalf of Breast Cancer UK, I would like to congratulate you on your recent appointment as Secretary of State for Environment, Food and Rural Affairs.

I welcome your first keynote speech on the environment and Brexit, in which you said that the UK 'can develop global gold standard policies on pesticides and chemicals', which would be 'informed by rigorous scientific analysis'.

I am sure that you will be aware of the Environmental Audit Committee's (EAC) recent report, The Future of Chemicals Regulation after the EU Referendum. In our submission to the EAC's inquiry, we highlighted the need for effective chemicals regulation to protect people from carcinogens and other hazardous chemicals linked to breast cancer.

The EU's approach to chemicals regulation, while not perfect, has meant that the UK benefits from some of the most effective chemicals regulation in the world. The application of the precautionary principle aims to ensure that we don't wait until public health suffers before regulatory action is taken, while a hazard-based element in risk assessment ensures that scientific evidence is properly utilised.

However, the Government has not committed to remaining in the EU's chemicals regulation system, including REACH (Registration, Evaluation, Authorisation and restriction of Chemicals).

I would like to highlight two common misconceptions about our current chemicals regulation system.

1) That it is too slow.

The process of authorising chemicals under REACH can take a long time, but for good reason. As Harvey Bradshaw, Executive Director of Environment and Business at the Environment Agency, said when giving evidence to the EAC inquiry:

'...once chemicals get into the environment they are very, very expensive indeed to get out. Of course, the major benefit of REACH in this respect is before a chemical can be used, manufactured or exported it is registered and, therefore, its characteristics and risk control measures are all put in place before it gets into the environment.'

2) That it is based too much on an assessment of hazard instead of risk

Assessing risk requires estimates of possible exposures to a chemical throughout its lifecycle, and it can necessitate using complex models to try to predict patterns of exposure. This is no less onerous than identifying the hazardous properties of a chemical.

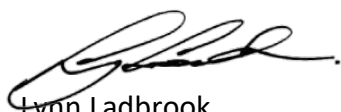
Household bleach is an example of how a hazard based element in regulation does not prevent useful chemicals from being utilised. REACH uses both hazard and risk in its assessment of chemicals, and the hazard based element is essential to its effectiveness.

I am hopeful that the Government will develop a clear plan for chemicals regulation in the UK, and I am encouraged by your commitment to rooting environmental policy in science. However, I am concerned that a UK-only chemicals regulation system could be less rigorous and less effective in protecting public health.

I would be grateful if you could provide greater clarity on the Government's plans for chemicals regulation. I would be happy to meet with you to discuss this issue further.

I look forward to hearing from you.

Yours sincerely,



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