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| Reply from the Danish EPA Chemicals Division to the UN Special Rapporteur on human rights and the environment on the “Call for inputs: the environment and the rights of the child” |  |

# Question 1

Please see the answer to question 5. We have combined our answers to question 1 and 5.

**Question 2**

In general, and as also reported to in a questionnaire to the Special Rapporteur on human rights and hazardous substances and waste in April 2016, the regulatory approach is a cautious approach, focusing on prevention of harm to human health, including vulnerable groups such as children and pregnant women, and the environment. The issue of causation for human health effects as a result of chemicals exposures is extremely difficult to establish, and only exist from sporadic knowledge following from chemical accidents, occupational exposures and for some pharmaceutical uses. Chemicals regulation is therefore primarily based on results from animal testing, where a cause-effect relationship can be established with reasonable certainty.

In order to increase awareness about hazardous chemicals and chemical exposure in the general population the Danish EPA has run several information campaigns and financed biomonitoring of chemical substances in children and pregnant women. Some of the Danish information campaigns have also been translated and published in English. These campaigns can be found here: <http://eng.mst.dk/chemicals/chemicals-in-products/consumers-consumer-products/information-campaigns/>.

Biomonitoring is not a continuously running program, the cohorts are temporary and specific, established to support general knowledge building on public health, including information on chemicals exposure. We refer to our reply dated 15 April 2016 to the questionnaire from the Special Rapporteur on human rights and hazardous substances and wastes (attached) for detailed information and links to the Danish biomonitoring results in children and pregnant women.

In 2017 an estimation of the combined exposure of children and unborn children for selected endocrine disrupting substances and selected neurotoxic substances were made. The estimations were made based on available studies on exposure from food, indoor environment and consumer articles. The report in English can be found here: http://www2.mst.dk/Udgiv/publications/2017/04/978-87-93529-84-7.pdf.

**Question 5**

Several pieces of legislation and policies globally, within EU and nationally are referring to the rights of future generations in relation to environmental matters. In our answer, mentioning of both children, unborn children and future generations are listed and considered relevant for this question.

Globally, the Stockholm Convention on persistent organic pollutants and the Dubai Declaration on which the Strategic Approach to International Chemcials Management (SAICM) builds, mention future generations and the unborn child in the preambular text and para 24, respectively.

Within the EU, the 7th Environmental Action Programme (7EAP) shall ensure that by 2020 the combination effects of chemicals and safety concerns related to endocrine disruptors are effectively addressed in all relevant Union legislation, and risks for the environment and health, in particular in relation to children, associated with the use of hazardous substances, including chemicals in products, are assessed and minimised (para 54(d)). Further, para 71(4) of the 7EAP describes that in order to minimise exposure to hazardous substances, in particular for vulnerable groups including children and pregnant women, a chemical exposure and toxicity knowledge base will be established on Union level.

The Council Conclusions “Protection of human health and the environment through the sound management of chemicals” was agreed by the 28 EU Member States in December 2016. The preambular text on page 5 of the conclusions stresses the need to ensure a transparent, simple and cost-efficient EU regulatory framework in order to ensure a high level of protection, e.g. of children, pregnant and breastfeeding women.

The EU Toy Safety Directive ensures that toys shall not jeopardise the safety or health of users of toys including the chemicals they contain. There are specific requirements for chemicals that can be used in toy or that are allowed to be released. Besides from these specific requirements the general requirement is that toys shall be safe.

Although not specifically mentioning children, unborn children or future generations, the EU chemicals legislation (REACH, preambular para 69) aims to ensure a high level of protection of, among others, vulnerable sub-populations. Vulnerable sub-populations are normally considered to cover children and unborn children.

On a national level, in the period from 2013 to 2016, the Danish EPA has had a special focus on children and young people to protect them against problematic chemicals. This special focus has involved extra marked surveillance activities on products that children and young people use as e.g. toys, cosmetics and electronic. Information campaigns for primarily importers and distributors on the regulation on toys, textiles, cosmetics and electronics were made and distributed before the market surveillance. These campaigns can be found online but only in Danish. Furthermore, the Danish EPA has a special focus on surveying the use of problematic chemicals that children can be exposed to. A list of reports on surveying problematic chemicals can be found here: http://eng.mst.dk/chemicals/chemicals-in-products/consumers-consumer-products/danish-surveys-on-consumer-products/ (not all of them with focus on children).