

**Comments on the 6<sup>th</sup> Environment action plan “Environment 2010: Our future, our choice”**

The Environmental department of Stockholm County Council thank the EU Commission for the opportunity to leave comments and remarks on the 6<sup>th</sup> EAP, and hope that they will be taken under consideration.

**General comments**

The 6<sup>th</sup> EAP is generally well put in order to reach a large target group. It is positive to see that for many areas, the 6<sup>th</sup> EAP has formed the basis for relevant legislation. It would be desirable to have more explicit formulations of the targets and also to include good examples as inspiration.

**Climate change**

In general, this objective and the targets cover most areas of importance, but we propose some additions, see below.

**Transports:**

Buses and ships also contribute to EU's emissions of greenhouse gases, and we think that in the next environment action programme they should be included in targets concerning the transport sector.

**Anaesthetic gases:**

Anaesthetic gases, e.g. nitrous oxide, sevoflurane, isoflurane and others, are used extensively within the healthcare sector. They are in general very potent greenhouse gases and some also have a negative effect on the ozone layer. The amounts may seem indifferent compared to the emissions from transport and industry, but since they have GWPs ranging from ca 300 to over 3000 their climatic impact is vast. Therefore, we consider that anaesthetics gases should be included in the next environment action programme.

## **Nature and biodiversity**

We have no comments on this area.

## **Environment and health**

### **Pharmaceuticals:**

When the 6<sup>th</sup> EAP was developed, there was little knowledge on the harmful effects that pharmaceuticals may have on the environment. EU has during the last ten years initiated several projects on environmental effects of pharmaceuticals, and there are numerous studies that show that residues of pharmaceuticals can be found in drinking waters throughout Europe. Pharmaceuticals are designed to have effect on life, and are very often persistent, and therefore they can remain in the environment for a long time and eventually lead to health and environmental problems. Hence we think that pharmaceuticals should be included in the next environment action programme. Hopefully this can also initiate legislation, both within pharmaceutical legislation and in the Water Framework Directive.

### **Chemicals:**

The implementation of Reach has lead to many improvements, but now we think that it is time to remove its present limitations and extend it to cover all chemicals:

- include chemicals that already existed on the market before Reach
- include chemicals that are produced in quantities below the ton limit

The candidate list must be enlarged and in order to manage to phase out these compounds, adequate support must be given, regarding substitution and information. It is also important to speed up the overall process.

Endocrine disruptive substances and nano particles are matters that we think should be further prioritized.

We also advocate a total ban on mercury as we think that EU should not continue to use such a poisonous substance when it can be substituted with other, less harmful compounds. As it is often used as an additive, there is a risk that instruments and bottles containing small amounts of mercury unintentionally are disposed of incorrectly.

Chemicals in goods is a matter of great importance that should be included in the next environment action programme, especially since the consumer's knowledge often is very limited and the common opinion is that everything is "safe". The existing regulations must be expanded.

**Synergy effects:**

During the last years, the knowledge on synergy effects have increased and as exclusion of synergy effects can lead to underestimation of environmental effects it is an important aspect to take into further consideration. For example can industry chemicals enhance the negative effect of pharmaceuticals on biota.

**Natural resources and waste**

The waste hierarchy is a success as it clarifies how all member states should work with the waste issue.

The next environment action programme should include special focus on foodstuff as it represents a large amount of the total waste. There are also indications that waste textiles are a matter that should be further investigated.

One important issue to put into practice should be to extend the producer's responsibilities for recycling from the present focus on packaging to cover all products.