

## Chemicals in Products: Safeguarding the Environment and Human Health

Royal Commission on Environmental Pollution  
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*Following is an abridged version of a much longer review that may be read on IUPAC's Web site at <[www.iupac.org/publications/ci/2004/2601/bw3\\_duffus.html](http://www.iupac.org/publications/ci/2004/2601/bw3_duffus.html)>*

### reviewed by John Duffus

This report carries with it a great deal of authority because it was produced by the Royal Commission on Environmental Pollution (RCEP). The RCEP is an independent standing body in the United Kingdom, established in 1970 to advise Queen Elizabeth II, government, Parliament, and the public on environmental issues. The commission sees its role as reviewing and anticipating trends and developments in environmental policies, identifying fields where insufficient attention is being given to problems, and recommending action that should be taken. The members of the RCEP are drawn from a variety of backgrounds in academia, industry and public life. Members serve part-time and as individuals, not as representatives of organizations or professions.

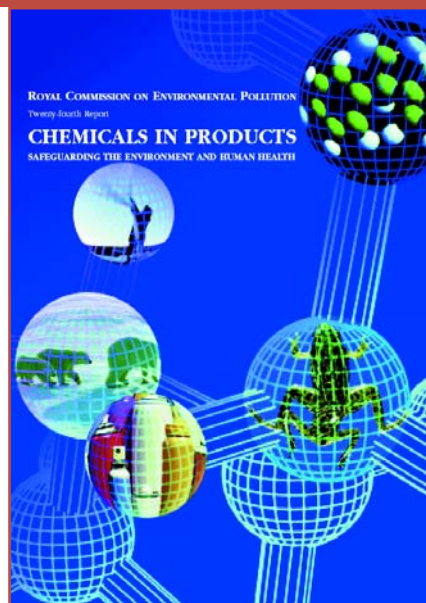
The findings and recommendations from a commission study are published in a report such as the one being reviewed here. Aimed at a general readership, the commission's reports are written so that no particular scientific or other expertise is needed to understand them. Most commission recommendations are addressed to U.K. government departments, and a U.K. government response to a commission report is prepared and published by one or more of the relevant U.K. government departments. The parliament is informed of the government response, usually a detailed paper setting out the government's decision on each recommendation.

The present report starts from the premise that "after more than a century of chemicals production, and decades of legislation attempting to deliver environmental safety from these chemicals, we still do not have a good understanding of the fate and effects of chemicals in the environment." The RCEP believes that "only a substantial paradigm shift will allow a start to be made to rectify this situation, and . . . that such a

start needs to be made now." Hence, the objective of the report is to offer a new approach to chemicals assessment and management. A major question for the reviewer is therefore whether this objective has been attained. A question which puzzles the reviewer, and for which no answer is given in the report, is

why the Royal Commission changed its focus from "Study on Long-Term Effects of Chemicals in the Environment," the original title (see Appendix A), to "Chemicals in Products: Safeguarding the Environment and Human Health." Personally, I should have found the originally proposed study more valuable than the present report and I regret that it was not pursued.

The first important point to make about this report is that it focuses on manmade synthetic organic chemicals. In doing this, it effectively ignores inorganic chemicals and even naturally occurring organic chemicals. This self-imposed limitation may be realistic in that it simplifies the problem faced by the Commission, but it is unrealistic in that it ignores the fact that environmental exposure to potentially toxic substances is not compartmentalized into synthetic or natural, organic or inorganic, air or water, soil or sediment, food or pharmaceutical etc. The ultimate logical objective of chemical safety regulation, however difficult to attain, ought to be broadbased regulation of exposure to all potentially toxic substances, of whatever kind and within all environmental media. To reach this objective requires bringing together existing piecemeal legislation within a single harmonized legislative approach. There are many practical reasons why this cannot be achieved easily but it ought to be the long-term objective of both regulators and scientists.



[www.rcep.org.uk/chreport.html](http://www.rcep.org.uk/chreport.html)

[www.iupac.org/publications/ci/2004/2601/bw3\\_duffus.html](http://www.iupac.org/publications/ci/2004/2601/bw3_duffus.html)