

**Consultation response: Ministerial declaration of the 2017 UN Environment  
Assembly 'Towards a Pollution-Free Planet'**

We, the NCD Alliance, together with members of our network, welcome the opportunity to comment on the Ministerial declaration of the 2017 UN Environment Assembly 'Towards a Pollution-Free Planet'. We recognise the opportunity and the need for greater coordination across the environment and health sectors to address the issue of pollution, with multiple co-benefits to be gained - including as outlined in the recent report by the Lancet Commission on pollution and health<sup>i</sup>. We look forward to supporting actions outlined in the declaration and to future opportunities for collaboration.

This response relates to the preliminary draft, released on 21 September 2017. The comments below have been prepared with contributions from the Colombian NCD Alliance, Vital Strategies, the Forum of International Respiratory Societies, the Health and Environment Alliance, and HealthBridge Foundation of Canada.

**Paragraph 1:**

- In order to elevate recognition of the threat of pollution to human health, we recommend that 'human health' is referred to early in the document. This could be achieved by including the phrase 'planetary and human health' at an appropriate point in this paragraph.

**Paragraph 2:**

- We suggest listing all environmental health risks discussed in the first sentence to make theme of paragraph clearer: 'As the representatives of all countries, we believe that, regardless of age, gender or culture, faith or wealth, no one should suffer serious illness or death from lack of access to clean indoor and outdoor air, safe drinking water, or facilities needed for hygiene and sanitation. An estimated 9 million premature deaths in 2015 were attributed to pollution, of which 70% were due to non-communicable diseases (NCDs).'<sup>i</sup>
- While the statistic of 20,000 deaths each day from air pollution is accurate, we recommend using a statistic for annual deaths to make it more easily comparable to other causes of global mortality. As such, the sentence could be rewritten as: 'In addition, 9 out of 10 of us will continue to breathe indoor or outdoor air that is unsafe, and 7 million<sup>ii</sup> people world-wide will die each year because of it.'
- Particular reference should be made to vulnerable populations affected by indoor air pollution: 'Indoor air pollution is currently a cause of 4.3 million premature deaths annually<sup>iii</sup> and disproportionately affects women, children and the world's poorest, but could be minimised through access to safe cooking, cleaning and lighting technologies.'
- In light of the controversies surrounding certain pesticides at present, it would be helpful to make specific reference to food production in the sentence which begins 'No community should be contaminated' by altering it to 'No chemicals should be used in food production that have not been rigorously tested and shown not to pose a threat to the health of people or the planet, and no community should be contaminated...'

**Paragraph 3:**

- We recommend adding 'human health' in the first sentence, to better reflect the language later in the paragraph and the priorities mentioned throughout the rest of the document.
- Suggest rewording first sentence as: 'We acknowledge the strong evidence of pollution's damaging impacts including harm to human health, climate change and other planetary health threats, such as biodiversity loss and ecosystem degradation.'
- In addition to the 2030 Agenda for Sustainable Development, we suggest mentioning other relevant international political commitments, including the Paris Declaration on Climate Change, the New Urban Agenda, and the World Health Organization road map for an enhanced global response to the adverse health effects of air pollution, in order to strengthen links across focus areas and not to duplicate work.

**Paragraph 4:**

- Suggest changing 'pollution is not new' to 'pollution is not a new threat'.

**Paragraph 6:**

- We suggest including language to address root causes of contamination touched on in this paragraph: 'We must act to stop the environmental contamination and waste that results from products that are inherently

harmful or carelessly discarded: properly recycle electronic waste and plastic packaging to reclaim valuable materials, reduce energy use and prevent contamination; act to stop the use and release of developmental poisons such as lead and mercury in ways likely to cause contamination and exposure [such as leaded paint], thereby reducing the harm to children's intelligence and potential and its costs in human potential and lifetime earnings; and act to stop international shipment of used products from wealthy to poor countries that can be expected to cause pollution and harm [such as trade of used motor vehicles with outmoded pollution control equipment and shipping of spent lead-acid batteries to countries without necessary recycling facilities].'

#### Paragraph 9:

- We suggest that an additional bullet is added acknowledging the need for action to address industry interference 'We recognise the environmental and public health threat of industry interference to secure economic gains, and commit to minimising opportunities and increasing transparency on industry participation in influencing policy at national or global level by scrutinising their activities and evidence generation.'
- We recommend that the following language is added at or after bullet a: 'We note that absence of evidence that a product is harmful is not sufficient confirmation of its safety for use.'
- In bullet c after 'sound technologies' we suggest adding 'from the level of industry to domestic cooking, heating and lighting.'
- We particularly commend the inclusion of bullet e.
- In bullet f, it would be pertinent to add the sentence 'This is particularly applicable, but not limited, to phasing out use of fossil fuels and promoting renewable alternatives' just after 'behavioural changes'.
- In bullet h, we recommend naming specific sectors to be engaged including the health sector. The health sector can assist in areas including health impact assessments of environmental policies in order to ensure that strong policies are adopted, and in leveraging a wider community in support of minimising pollution.

#### Paragraph 11:

- We recommend that 'academia and healthcare professionals' are added into the list of actors in the first sentence, on account of the role of their role in both minimising negative impacts from hospital or laboratory processes, and also in raising awareness of and preventing environmental risks.
- We are concerned by the heavy emphasis on individual action in this paragraph. While each person does have a role to play, this is not greater than the responsibility of the industry and other sectors, and is currently more strongly emphasised. It is crucial that this document is not used by industry actors in particular to downplay their own responsibilities; the focus in the second half of this paragraph should instead be on the responsibility of governments to ensure that citizens have access to accurate and timely information on environmental risks in order to make informed decisions and support action to minimise pollution.

<sup>i</sup> Landrigan PJ, Fuller R, Acosta NJR et al. The Lancet Commission on pollution and health. Online, October 19, 2017. Accessed 28 October 2017 [http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(17\)32345-0.pdf](http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(17)32345-0.pdf)

<sup>ii</sup> WHO News Release: 7 million premature deaths annually linked to air pollution. 24 March 2014. Online, accessed 26 October 2017 <http://www.who.int/mediacentre/news/releases/2014/air-pollution/en/>

<sup>iii</sup> WHO Factsheet #292, Household Air Pollution and Health. Online, accessed 28 October 2017 <http://www.who.int/mediacentre/factsheets/fs292/en/>