



ROYAL NORWEGIAN MINISTRY  
OF THE ENVIRONMENT

European Commission,  
DG Environment  
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B-1049 Brussels  
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Your ref

Our ref  
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**Consultation on the EU environment policy priorities for 2020: Towards a Seventh EU Environment Action Programme - Submission from Norway**

Reference is made to the consultation document on EU environment policy priorities for 2020 and the Seventh EU Environment Action Programme (7EAP). Norway welcomes the document and would like to provide input on the priority areas to be addressed.

The Sixth environment action programme is a part of the European Economic Agreement (EEA), protocol 31, and we have followed the debate on the 7EAP with interest. In our opinion it is important and useful to have an environment programme as an overall framework, and we support the work that is being done to develop a new action programme. This is needed in addition to the broad effort to promote sustainable growth under the Europe 2020-strategy. Norway supports the goals and ambitions for a resource efficient European economy. The Roadmap to a Resource Efficient Europe, and especially the measure to increase the environmental requests in sectors like agriculture and fisheries is especially important.

A significant amount of the environmental impact has its origins outside the EU/EFTA-countries, and this emphasises the need to work on all levels, including local, regional and globally. Norway is chairing the Nordic Council of Ministers this year, and we have prioritised work on climate and green growth. A revised environmental action plan for the Nordic countries for the period 2013–18 is under preparation. The focus will be on green growth, climate change, biodiversity and chemicals. Through the work of the Nordic Council of Ministers, further input will be provided to the EU in these areas.

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### **Better implementation**

We share the Commission's concern regarding the current level of implementation of the existing environment acquis, and we agree that the full and even implementation of existing environment legislation is a good investment for both the environment and human health, as well as for the economy. Better implementation of the environment acquis should therefore be one of the main priorities in the next EAP. Norway also shares the view that the 7EAP should secure the necessary commitment to fill significant policy gaps in the field of environment, where justified by the latest scientific information, and in line with the precautionary approach.

### **Toxin free environment**

In light of this, we are of the opinion that that a prioritized area should be to work towards a toxin-free environment, and in particular addressing the challenges faced regarding the combination effects of chemicals, safety concerns related to endocrine disruptors (EDCs), and nanomaterials. In our view, there is currently a policy gap with respect to these areas, and these issues can pose a threat to human health and the environment. This should therefore be addressed through the 7EAP.

**Nanomaterials and nanotechnology** have the potential to promote important innovations, but at the same time, possible risks need to be addressed. We believe a key goal should be to achieve the same level of protection for human health and the environment from potential risks of nanomaterials, as for other chemicals. The current lack of knowledge on the hazards and risks represent a challenge in achieving such a goal. To ensure the same level of protection from possible risks of nanomaterials, we believe that the regulatory regime related to nanomaterials must be improved. In particular the REACH regulation, which is established as the basic regulation of chemicals, needs to be improved. This could be stated in the 7EAP. Elements that need to be improved include ensuring chemical safety assessment of all nanomaterials; securing registration of nanoforms of substances; adjusting thresholds and deadlines for the registration of nanomaterials, including specific data requirements for nanomaterials; and adjusting test methods and guidelines. In our opinion these elements could be improved by developing a new legislation; by modifying REACH, its annexes and technical guidelines; or by adding a "nano-patch" on REACH, i.e. a stand-alone legislation that specifies how REACH tools and provisions should be applied with respect to nanomaterials.

With respect to **endocrine substances (EDCs)** research shows that such substances may be a contributing factor to the significant increase in health issues as cancers, diabetes, obesity and declining fertility. Although risk assessment and regulatory frameworks for dealing with EDCs have been developed, there are still a lot of factors that make the risk assessment process difficult and there are gaps in the scientific knowledge. We believe it is important for

the 7EAP to give an increased focus to EDCs and to develop specific measures to tackle the challenges related to these substances.

**Combination effects of chemicals** is also an issue that is poorly understood. Current regulatory approaches to the assessment of chemicals are usually based on the evaluation of single substances. There are concerns that this is insufficient and that combination effects need to be addressed in a more systematic manner. As for nanomaterials and EDCs, the 7EAP should give increased focus to the combination effects of chemicals, and develop specific measures to address the challenges.

Norway will support and be an active partner for the EU in this work, both bilaterally, as well as through the Nordic Council of Ministers and the EEA/EFTA. We hope that our comments will be of use to you in your further work with the proposal for a new environment action programme.

Yours sincerely,



Håge Andenæs

Director General

Head of Department for International Cooperation