Link Chemicals Taskforce
Our core policy asks and why they're needed: 2026-28

The problem of chemical pollution

Pollution from harmful chemicals poses a growing, long-term and sometimes irreversible threat to our health, wildlife and economy. But our regulatory systems are failing to keep pace with the scale, persistence and complexity of chemical pollution to properly protect people and the environment.

Thousands of known and suspected harmful chemicals are used every day in industrial processes, agriculture and consumer products. Many chemicals enter our water, soil, food and air throughout their lifecycle. Some of these are persistent and bioaccumulative, remaining in the environment for decades and building up in wildlife and humans.

PFAS (Per- and polyfluorinated alkyl substances) 'forever chemicals' exemplify the scale of the challenge. These highly persistent substances are now recognised as one of the major pollution crises of our time and have been found in high concentrations in water bodies, soil and up to an estimated 10,000 'high risk' PFAS contaminated sites across England. The clean-up and health costs of this pollution are staggering, growing and will overwhelmingly be borne by the public without action. For example, the Environment Agency has estimated that cleaning up high-risk sites could cost £31-121 billion.

The use of hazardous chemicals in products is also creating a significant barrier to a safe **circular economy**, turning potentially recyclable resources like upholstered furniture into a costly toxic waste burden for local authorities.

The impacts on **wildlife** are severe and widespread. The UN has identified pollution as one of three interconnected causes of the planetary crisis, alongside climate change and biodiversity loss, with each amplifying and accelerating the others. Chemical pollution harms reproduction, immune, hormonal and neurological systems in wildlife, impacting species survival, migration and resilience.

Fresh water is losing biodiversity faster than any other ecosystem on Earth, and chemical pollution is a major contributing factor for this decline. Many of the chemicals found in our fresh, coastal and marine water do not break down in the environment; some of these are toxic and build up in greater concentrations in animals higher up the food chain, such as otters, whales, dolphins and birds of prey. Chemical pollutants can enter our waterways from agricultural runoff, road runoff, sewage sludge applied to land, industrial sites and partially treated and untreated wastewater.

Chemical pollution also poses significant and growing risks to **human health**. Exposure has been linked to cancers, hormone or immune disruption, reduced fertility and developmental impacts and cardiovascular disease. Humans are exposed through the air we breathe, the food we eat and water we drink and everyday consumer products. Women and children face disproportionate risks from chemical exposure. Prenatal development and early childhood are particularly sensitive periods during which exposure can cause irreversible harm with lifelong consequences.

The failure of chemical regulation

Since leaving the EU at the start of 2021 and establishing a separate post-Brexit regulatory system for chemicals, Great Britain has not had the capacity, data or will to match the pace and scale of EU regulation on chemicals. As well as falling sharply behind its environmental and health protections, its regulator the Health & Safety Executive, has often taken less protective decisions than the EU's, such as allowing longer for and requiring fewer conditions on the industrial use of extremely harmful substances on the authorisation list. At the end of 2025, the Government signalled a welcome and sensible step towards EU aligned protections which is still the most rigorous standard of protection from chemicals globally.

While the EU sets the highest chemical safety standards globally, it is still far from perfect. It has historically taken decades to ban extremely persistent chemicals, which do not break down and continue to contaminate the environment for many generations long after they've been released. For example, the UK's killer whale population has not had a calf in almost 30 years, which has been linked to PCB pollution – a chemical that was banned in the UK in the 1980s but is still in the environment and causing harm. While the EU has made significant progress in phasing out some toxic chemicals, this continues to be outstripped by their rise in production and toxicity. One of the problems is that it can take officials decades to navigate complex and slow systems to prove unacceptable risk and phase out chemicals known to be dangerous and even if a ban is finally introduced, industry can often shift to sister substances in the same group that may be just has harmful but are less understood.

Recommendations

The policy asks below are needed to reduce pollution and the harm chemicals are causing our health and environment and would help to meet international biodiversity commitments. They address longstanding weaknesses in the regulation of chemicals and incorporate core environmental principles – such as prevention (avoiding harm before it happens) and precaution (which allows protective action to be taken in cases where the scientific evidence is uncertain, but risks are high).

There are more than 40 chemical-related regulations, two of the most important of which are REACH Registration, Evaluation, Authorisation and Restriction of CHemicals Regulation (which

restricts and regulates the use of the most hazardous chemicals) and CLP Classification Labelling and Packaging of chemical substances regulation (which classifies substances as hazardous – e.g. carcinogenic or mutagenic – and is linked to and triggers regulatory protections in areas from worker safety to transportation).

Effective GB regulation should provide better protection from harmful chemicals by:

1. **Prioritising preventing chemical pollution at source:** Regulation should ensure that substances which are particularly hazardous - where there is **evidence of persistence, toxicity, mobility, endocrine disruption or bioaccumulation – should trigger regulatory action** and not be used in a broad range of applications including consumer products.

Preventing chemical pollution at source is considerably more effective and cost-efficient than addressing its impacts, but regulation does not currently phase out the most harmful chemicals or adequately support innovation in safer alternatives and green chemistry. Strict regulation with clear phase-out deadlines has repeatedly proven to be the main driver of substitution toward safer alternatives.

Persistent chemicals such as PFAS and PCBs are particularly problematic because they resist breakdown, remaining in the environment for generations. This persistence is resulting in a growing global burden and leading to continuous and sometimes lifelong exposure of humans and wildlife, increasing health impacts which emerge over time, and which are nearly impossible and costly to remove once released. Endocrine-disrupting chemicals demand urgent attention because their use poses growing risks to human health, wildlife, and the economy, with exposure during critical developmental windows like foetal growth and puberty—when hormones govern brain development—can lead to irreversible effects that may not surface until years later.

The EU has introduced new hazard classifications including for endocrine disruptors and persistence, which are being followed by regulations that act on warnings from scientists to protect people and the environment from exposure to substances with these properties. For example, recent EU legislation automatically bans substances classified as endocrine disruptors from toys or in food packaging.

2. **Adopting a grouping approach**, to **s**peed up regulation of harmful chemicals and avoid regrettable substitution.

Regulating substances one-by-one or in too narrow groups is too slow for adequately protecting people and the environment and is costly on retailers and downstream users of chemicals that invest in reformulating products and processes to switch to alternatives which may be subsequently restricted. For example, restrictions on Bisphenol A (BPA) have led to its replacement by other bisphenols that are as harmful - so that when a ban on BPA was

proposed in thermal paper, Bisphenol S usage doubled in one year (2016-17). In the case of PFAS – a family of over 10,000 chemical substances - international bans on the most widely used and studied PFAS (PFOA and PFOS), have led to these chemicals being replaced by other PFAS, whose levels are now steadily rising in the environment.

The EU has proposed a broad ban on the use and manufacture of all PFAS as a group of 10,000+ substances to prevent at source their further build-up in the environment, although with some derogations for essential uses for which alternatives are still in development. This forms part of its Restrictions Roadmap which sets out restrictions in the pipeline of groups of widely used chemicals of key concern such as flame retardants and bisphenols, or those with specific hazards from childcare products.

3. **Addressing the cocktail effect.** Mixtures of chemicals can create combination or even synergistic effects – known as the cocktail effect – even if each chemical is detected below a safe exposure limit calculated for that single substance.

Combinations of chemicals may be particularly harmful when they act on the same biological pathway (e.g. endocrine disruption), and effects may be seen either at an individual, species or population-level (e.g. reduced abundance, altered species diversity, lessened resilience to other stressors). For example, when pesticides occur in mixtures, toxicity can accumulate through additive and synergistic interactions.

While legislative reforms to EU REACH that were set to include a Mixture Assessment Factor in risk assessments to address the cocktail effect have stalled, the combined risk of mixtures should be recognised and acted on in legislation. For example, new EU regulatory standards for chemical pollutants in water - that set 'safe limit' concentrations which should not be exceeded – include for the first time groups of pesticides and a single standard for 24 PFAS combined.

4. **Meeting EU environmental and public health protections from harmful chemicals as a regulatory baseline**, including its new hazard classifications and proposed broad ban on PFAS and groups of extremely harmful chemicals set out above. Whilst far from perfect, the EU sets the highest chemical safety standards in the world.

At the end of 2025, the Government signalled a sensible, but significant move towards aligning with EU regulatory protections unless there are "compelling reasons" to diverge, and for legislative reforms enabling this to be "in force by December 2028". This would need to ward against becoming a 'pick and choose' approach where the UK adopts some protections and not others, that would be vulnerable to backdoor lobbying and delay tactics, could result in less protection from harmful chemicals and create regulatory uncertainty. **Reforms must therefore ensure that divergence is rare and relatively minor, that any deviations from EU protections are transparently and openly justified against clearly defined and stringent criteria that do not result in lower protections** than the EU and is open to expert and public

challenge. Indeed, this is the only safe approach that can support the government's low safety data model that would limit the scope for scientifically robust and evidence-led divergent approaches. To create a safe and stable system, reforms should be implemented in good time and have the powers to enable the UK to catch-up with the EU and adopt critical EU regulatory protections such as the EU's PFAS restriction before the end of this UK Parliament.

5. Ensuring measures to control at source, must be accompanied by action to **address impacts from products throughout their lifecycle**.

Policy must also ensure a **clean circular economy** with products that are safe by design, with safe and sustainable by design regulations, chemical transparency and traceability throughout supply chains, during use and disposal to enable safe use, reuse and recycling. The importance of this was highlighted by the introduction of the requirement to incinerate waste upholstered domestic seating (WUDS), following new research which found many WUDS items to contain chemicals now restricted under the United Nations Stockholm Convention as Persistent Organic Pollutants (POPs). This costs councils and ultimately taxpayers' huge amounts of money.

6. Developing an effective **monitoring and alert system** for chemicals in products, waste, humans, wildlife and the environment.

For example, the UK is continuing to use outdated regulations for monitoring and controlling harmful chemical pollutants in the water environment and should meet or exceed new additions to the EU's Priority Substances List and its more stringent water quality standards (EQSs) for some of the chemicals on the list, as well as establish an equivalent to the EU's 'Watch List' of substances to monitor potential substances of concern. This is a perquisite for understanding long-term trends, pathways into the environment, impact and interventions needed to reduce harm.

7. **Making polluters pay the cost of remediation**, where clean-up is possible.

Remediation of historic pollution needs to happen alongside preventing and controlling emissions at source. But the public are currently paying the costs of clean-up – which are substantial and growing – with the most affected communities living in high-risk areas disproportionately burdened. Remediating chemical pollutants in our water system and in high-risk sites should be funded by the industries that produce and profit from them.

8. **Taking a 'One Health' approach**, due to the interdependence and interconnectedness of the health of humans, animals and the environment.

The contamination of the environment plays a critical role in the build-up of chemical pollution in the bodies of people and wildlife, from the air we breathe, to the food we eat.

Analysis by WCL and The Rivers Trust in 2025 found levels of PFAS in aquatic life many times higher than proposed new EU safe levels for wildlife. It also found that if a portion of these freshwater fish was eaten every month it would be equivalent to more than the amount considered safe to consume over a whole year based on standards set by the European Food Safety Authority.

Dolphins, otters, porpoises, and birds across the UK have also been found to have toxic chemicals in their tissue and organs. Watershed Investigations, the Marine Conservation Society and the Guardian obtained official data on more than 1,000 animals to reveal widespread contamination by a range of PFAS, particularly PFOS and PFOA. Environmental quality standards for PFOS states that no fish should have more than 9 micrograms per kilogram (9.1µg/kg) in their tissue, to protect top predators and people who consume the fish from bioaccumulating PFAS in their systems, but 12% of the fish in the datasets exceed the threshold, with some such as flounder and roach as high as 34µg/kg and 41µg/kg respectively.

The data, plotted on Watershed's pollution map, shows that many animals have been found to contain much higher levels, particularly in predators higher up the food chain. Otters were found with levels as high as 9,962µg/kg, harbour porpoises with 2,420µg/kg, grey seals with up to 357µg/kg and dolphins up to 78µg/kg. Gannet eggs had levels up to 158µg/kg and buzzard livers had up to 104µg/kg.

9. **Establishing a "one substance one assessment" process** for the risk and hazard assessment of chemicals

A single chemical is often regulated differently under different regimes depending on its use, which can slow down protective regulation when a new risk emerges.

This fragmented framework has meant the pesticides imidacloprid and fipronil could be used as flea treatments for pets, despite being banned for use on crops due to their harmfulness - there is evidence that sales of these harmful substances have increased and are now close to levels before they were banned in agriculture. The Office for Environmental Protection has recommended a 'one substance, one assessment' approach to "reduce duplication of technical and scientific work on chemicals and would optimise cross-government resource and expertise to support government priorities".

Link's Chemicals Taskforce brings together a wide range of nature and wildlife organisations working on chemical pollution. Examples of some of our work is below:

- Fidra Impacts of chemical of pollution
- The Rivers Trust 2024 State of Our Rivers Report (2026 report due out in October).
- CHEM Trust The Government's response to Parliament's PFAS inquiry
- Rivers Trust and Wildlife & Countryside Link data analysis of chemical pollutants in water

- Whale and Dolphin Conservation: The impact of chemical pollution on whales and dolphins
- Wildfish, RSPB, Buglife and the Pesticide Collaboration 2022 report 'The Silent Killer of UK Rivers'.
- The Wildlife Trusts Say No to Neonics
- Soil Association Cut the chemicals from our food and fields
- Marine Conservation Society collaboration with Watershed Investigations, and the Guardian UK wildlife forever chemicals analysis
- Angling Trust Water Quality Monitoring Network report (2024-25)

The Chemicals Taskforce works closely with the Pesticides Working Group. For information on pesticides and the work of the group, please see https://www.wcl.org.uk/pesticide-reduction.asp.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 97 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone.

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The following organisations have inputted into this briefing and support
Angling Trust
CHEM Trust
Fidra
Froglife
Marine Conservation Society
Planet Patrol
The Rivers Trust
Soil Association