

The Pollution Playbook



Toxic chemical pollution is a global crisis.¹ Regulators struggle to keep up² with than 350,000 different chemicals and chemical mixtures around the world³ — many which are harmful to human health.⁴ Manufacturers of these chemicals contribute to this regulatory gap by using deceptive tactics, such as hiding data and undermining independent science, which allows them to continue producing and selling their toxic products. Companies often present themselves as essential policymaking partners⁵ because they have unique access to the data on their chemicals but then use this position to consistently oppose regulation. This factsheet summarizes the Center for International Environmental Law and Corporate Europe Observatory’s full report: [The Pollution Playbook: How Industry Blocks Regulation of Toxic Chemicals](#) by briefly presenting four case studies to illustrate some of these deceptive tactics.

1 Withholding Knowledge: Per- and Polyfluoroalkyl Substances (PFAS)



PFAS, or ‘forever chemicals,’ are a group of more than 10,000 man-made chemicals with a range of harmful human health and environmental impacts.⁶ Evidence suggests PFAS manufacturers were aware of their potential hazards in the 1970s and did not adequately inform the public or regulators.⁷ PFAS lobbyists have also funded their own science to counter independent, peer-reviewed evidence and distorted public discourse.

2 Undermining Independent Science: Bisphenol A (BPA)



BPA is an endocrine-disrupting chemical commonly used in food packaging⁸ with negative health impacts ranging from neurodevelopmental effects to reduced fertility.⁹ Plastics Europe — the European plastics industry trade association — unsuccessfully sued the European Chemicals Agency (ECHA) three times over its regulatory classifications of BPA.¹⁰ In one case, they claimed some of the scientific studies ECHA used were limited, unreliable, or not properly taken into account¹¹ — all claims determined to be unfounded.¹²

3 Establishing Front Groups: Benzene



Benzene, which is used in a wide variety of industrial applications, has been known for decades to have serious health impacts, most strongly associated with leukemia and other blood cancers.¹³ The fossil fuel industry has tried to limit its regulation in Europe through a front group, called Conservation of Clean Air and Water in Europe (Concawe), which pushed against the European Union scientific body's conclusions of a lower occupational limit for benzene.¹⁴

4 Combining Disinformation Strategies: Pesticides



Pesticides play a key role in the decline of insects, including pollinators vital to our food supply.¹⁵ Pesticide industry actors have employed a range of tactics to manipulate science and ensure their products remain on the market. These have included ignoring or disqualifying independent, peer-reviewed evidence from regulatory assessment,¹⁶ ghostwriting scientific studies,¹⁷ and commissioning their own review of European Food Safety Authority guidance on neonicotinoid pesticides but calling it an 'independent review.'¹⁸

Recommendations:

- ✓ Ban corporations manufacturing and selling harmful products, such as chemicals, pesticides, and plastics from participating in regulatory processes, similar to the World Health Organization's rules for the tobacco industry.
- ✓ Implement clear conflict of interest rules and procedures to require disclosure of lobbying.
- ✓ Establish strong, well-funded, and truly independent scientific channels to support policymakers in researching harmful substances and implementing policies that protect human health and the environment.



CENTER for INTERNATIONAL ENVIRONMENTAL LAW



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EU lobby transparency register numbers:
CEO #5353162366-85 and CIEL #001245815997-85.

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Endnotes

Endnotes

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