

Public consultation on pharmaceuticals in the environment

Fields marked with * are mandatory.

About this consultation

This consultation is part of a study aimed at supporting the development of a European Union (EU) strategic approach to pharmaceuticals in the environment, and in turn at helping the EU achieve the United Nations Sustainable Development Goals, in particular SDG 6 ("Clean Water and Sanitation"), as well as objectives in EU legislation such as the "good status" objective in the Water Framework Directive. Adoption of the approach is to be followed by proposals for specific measures, as appropriate, which would be subject, as necessary, to full impact assessment.

Pharmaceuticals can enter the environment during their production, use and disposal. The need for a strategic approach has been prompted by concern about risks to the environment itself, and possibly to human health via the environment. Any actions to address those risks must also ensure that humans and animals can continue to benefit from the appropriate use of pharmaceuticals and that the competitiveness of EU healthcare systems is maintained.

This consultation aims to collect feedback and further information from stakeholders on their perception of the problem, the need for action, and on some of the actions that could be prioritised.

A **background paper**, provided with this questionnaire, describes 30 possible policy options grouped into 10 action areas. These have been identified on the basis of a review of the recent literature and preliminary consultation of stakeholders. You may wish to read the summary of the paper, or the paper itself, before answering the questions, but this is not essential.

Your responses will help the European Commission (EC) to formulate the strategic approach and prioritise areas for action. Thank you in advance.

Important note on the publication of answers

Please note that the responses received will be published on the EC's website, together with the identity of the contributor unless the contributor objects to the publication of personal data.

* 1. Please indicate your preference as regards publication of your contribution

- My contribution may be published, mentioning my name or the name of my organisation as well as country of residence

- My contribution may be published anonymously

Please note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N°1049/2001](#). Please also read the specific privacy statement referred to on the consultation webpage.

About the respondent

*** 2. Are you replying as:**

- An individual
- An EU institution
- A national/regional/local public authority
- A company
- A business or workers' organisation
- An NGO, environmental or consumer group
- A research organisation
- Other

*** 3a. Please state your name or the name of your organisation (published)**

Consumer Futures Unit (CFU) at Citizens Advice Scotland (CAS)

*** 3b. Please provide your email address (*Please note that your email address will not be published regardless of the option chosen in question 1*)**

jana.eyssele@cas.org.uk

*** 5. How many members does your organisation or group represent?**

All citizens in Scotland (approx. 5,404,700).

*** 6. Is your organisation registered in the Transparency Register of the European Commission?**

- Yes
- No

*** 8. What is your main field of activity or main area of expertise or interest?**

- Pharmaceuticals
- Human healthcare (including pharmacy)
- Veterinary care (including veterinary pharmacy)
- Water and waste water management
- Waste management
- Other
- No specific relevant expertise

*** If other, please specify:**

Consumer representation in the regulated industries of water, energy, and post in Scotland.

***9. What is your main country of residence or activities? (published)**

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

General questions on the issue

Awareness of the issue

***10. How would you describe your level of awareness of the issue of pharmaceuticals and the environment?**

- Nil (It hasn't been on my/our radar until now)
- Low (I/we have heard a bit about it)
- Moderate (I/we have heard a fair amount about it)
- High (I/we have been looking at it in detail)

*** 11. What has made you aware of the issue of pharmaceuticals and the environment? (Please mark all that apply.)**

- Seeing this consultation
- Reports in the press, on television or social media
- Campaign material from organisations such as NGOs
- Work
- Information from pharmacist/doctor/dentist/hospital/vet
- Talking with friends/family
- Other

*** If other, please specify:**

500 character(s) maximum

Hydro Nation Forum in Scotland
(<http://www.gov.scot/Topics/Business-Industry/waterindustryscot/ScotlandtheHydroNation>).

*** 12. Has awareness of the issue made you do any of the following? (Please mark all that apply.)**

- Start taking unused medicines to the pharmacy (if you were not already)
- Stop flushing unused pharmaceuticals down the sink or toilet
- Talk to your pharmacist or doctor about the issue
- Talk to friends or family about the issue
- Change your consumption of over-the-counter (non-prescribed) medicines
- Other

*** If other, please specify:**

500 character(s) maximum

Tentative initial discussion to better understand our role within the water industry in terms of pharmaceuticals.

*** 13. Do you see a connection between this issue and the development of antimicrobial resistance (AMR)? (Resistance means, for example, that existing antibiotics may no longer be effective against disease-causing bacteria.)**

- Yes
- No
- Not sure

14. What (other) aspect of the issue (of pharmaceuticals in the environment) concerns you most?

500 character(s) maximum

Exposure of consumers and the environment to high levels of pharmaceuticals in water; additional costs for more intense wastewater treatment to address pharmaceuticals in water being recovered through an increase of water charges for consumers.

Relative importance of actions

*** 15. How do you see the need for actions (including research) to address the risk from pharmaceuticals in the environment?**

A) For human pharmaceuticals

- Not necessary
- Necessary but not urgent
- Urgent
- No opinion

*** B) For veterinary pharmaceuticals**

- Not necessary
- Necessary but not urgent
- Urgent
- No opinion

If you wish to, please explain your answer:

1500 character(s) maximum

This is not within our remit. However, we recognise that consumers should be safe from negative impacts of pharmaceuticals in the environment, and should be able to access information on the issue to change their behaviour and protect themselves and the environment.

16. Please give each of the twelve possible actions below a score between 5 and 0, where 5 = high priority action, 3 = medium priority action, 1 = low priority action, 0 = not in favour). All actions must be scored. Please note that the actions have been numbered to indicate which action areas they relate to in the background document, but are in most cases more specific.

	5	4	3	2	1	0
* 1. More research to better understand the risks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 2. "Greener" design of pharmaceuticals, e.g. to make them more biodegradable	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 3. More stringent conditions for putting a pharmaceutical on the market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 4. Cleaner manufacturing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 5. Better risk mitigation, e.g. not allowing over-the-counter sale of pharmaceuticals that pose an environmental risk	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 6. Better/more thorough post-market monitoring of pharmaceuticals in the environment and feedback to the regulatory process	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 7. (a) Better training for medical professionals, e.g. about pharmaceuticals that are less harmful for the environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 7. (b) Better information for the public, e.g. about how to dispose of unused medicines	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 7. (c) Smaller packaging sizes, to reduce unnecessary waste /disposal	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 8. Improved handling of waste pharmaceuticals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 9. (a) Improved sewage and wastewater treatment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* 9. (b) Improvements in livestock farming to reduce the use /emission of pharmaceuticals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you wish to, please explain your scoring or add brief comments on the listed actions, referring to their number.

1500 character(s) maximum

The CFU, part of CAS, uses research and evidence to put consumers at the heart of policy and regulation in the Scottish energy, post and water sectors. We work with government, regulators and businesses to put consumers first, designing policy and practice around their needs and aspirations.

As the recognised consumer representative body and a member of the Scottish Government's Hydro Nation Forum, we will support actions that (a) improve consumers' access to clean drinking water that does not impact their health; (b) make food and water consumption and use of medicine safe so that it will not limit the effectiveness of future medical treatment; and (c) provide consumers with the necessary information to make informed decisions regarding the purchase, use, and disposal of pharmaceuticals, as well as the consumption of food and water that is prone to have high levels of pharmaceutical residuals. With regards to Q16, unless the issues raised relate to drinking water and wastewater treatment, we have no policy position. We especially welcome initiatives preventing pharmaceuticals from entering the environment, as this would help to negate unnecessary expenditure for the water industry, and ultimately to paying consumers, to remove pharmaceuticals from water (e.g. actions 2-8). Moreover, we support action 6, as we see a need to coordinate public messaging to educate and encourage positive behavioural change in how consumers dispose of disused pharmaceuticals.

17. If you are aware of any actions already being taken in your own country, please mention them and provide details.

1500 character(s) maximum

The Consumer Futures Unit's Water Team works with the Scottish Government, Scottish Water (the publicly owned water supplier in Scotland) and its regulators: the Drinking Water Quality Regulator for Scotland, The Scottish Environment Protection Agency, and the Water Industry Commission for Scotland, to address issues related to the water industry that impact upon the environment.

We recognise that the disposal of pharmaceutical products is an area of growing interest and research. Key stakeholders within the Scottish water sector are monitoring research conducted in other EU member states. The Hydro Nation Forum is currently looking to develop more collaborative thinking and strategies that will address the inappropriate disposal of household and industrial waste in to the environment. This will require the development of effective consumer engagement strategies.

18. Please feel free to suggest further actions, in addition to those included in this questionnaire and the background document, or in your answer to Q.17, to address the impacts of pharmaceuticals in the environment.

1500 character(s) maximum

19. We invite you to suggest information sources on pharmaceuticals and the environment (titles of publications and web links are appreciated) in order to increase the evidence base on the topics addressed in this questionnaire.

1500 character(s) maximum

If you wish to submit additional documentation (up to three pages), please upload your file here.

The maximum file size is 1 MB

Contact

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