

We are writing to express our concerns regarding the new planning application: Proposed development at EISAI Europe Limited, European Knowledge Centre, Mosquito Way, Hatfield, AL10 9SN; application reference: 6/2022/1853/MAJ.

We object the proposal (Construction of a 4 012sqm extension to the existing warehouse space (use class E) with associated plant and works including the relocation of a bicycle shelter, re-routed internal access road and landscaping. We believe this new building site if accepted will NOT be beneficial for residents of Hatfield Business Park.

Our concerns are focused on following points:

- Taking away a green grass area and cutting over 35 fully grown trees located on site to build an enormous extension to already large in size manufacturing site will lead to increase noise and air pollution.
- Adding additional manufacturing capacity may have a long effect on the road traffic noise, traffic jams and pollution caused by many large HGV vehicles bringing necessary equipment to carry the refurbishment work on a site as well as increased traffic after expansion. This will have a direct effect on health and wellbeing for residents of Clarkson Court and Parkhouse who lives in a proximity to the site.
- We strongly oppose to install solar power panels on the roof of newly constructed site as this may cause uncontrolled concentrated sun ray reflections over surrounding residential buildings which may lead to fire or damages to the surrounding properties.
- Environmental impact of the industrial process which if not regulated can lead to local water/air pollution as well as increased risk or releasing harmful chemicals to the environment, again negative impact on residents of the Hatfield Business park and animals living in the area.
- In our view, chemical/pharmaceutical manufacturing being located very close to densely populated areas put residents to high health risk due to unknown often hazardous substances being delivered/handled at the site.

Please note that earlier planning permissions which agreed to build residential buildings in commercial space without forming green belt boundaries – current trees and grass land from this safe space. Should be kept to help with residents' wellbeing and to allow peaceful leaving next to commercial units, we should not be putting commercial profits in front of resident's health.

**There are number of health and safety studies that confirms negative impact of manufacturing facilities being build near residential properties as per below example:**

Study published in October 2, 2018, updated 14 Feb 2022 by pharmaceutical-technology association.

Over the past 30 years, international organisations and the pharmaceutical industry have begun to notice that the detrimental impact pharma products have on the environment on a global scale.

Pharmaceutical products enter the environment at various stages of their life-cycle, but particularly during the production phase. One of the main threats is that discharging antibiotics into the environment can promote the natural development of antibiotic-resistant pathogens that are harder to treat. Lord Jim O'Neill noted this trend in his 2016 UK government-funded independent Review on Antimicrobial Resistance.

Although it is a global issue, like other environmental issues, pharma pollution more directly and seriously affects those living near production plants whose water and food sources are contaminated with waste pharma products.

Health Care Without Harm (HCWH) Europe runs the Safer Pharma campaign to raise awareness of the negative relationship between pharma and the environment and challenge the healthcare industry to clean up its production.

“The production of both active pharmaceutical ingredients (APIs) and finished dose antibiotics is concentrated in specific locations so the resulting point, source pollution, is in incredibly high concentrations and encourages the development of drug resistance,” says HCWH Europe pharmaceuticals policy officer Dr Adela Maghear. “This practice has a detrimental impact on vulnerable populations living near manufacturing facilities and wastewater treatment plants in these countries.”

The pollution of pharma products into the environment also adversely affects animals, particularly fish living in contaminated water. For example, a report published in science journal Nature in 2009 noted that ‘many of Europe’s rivers are home to male fish that are ‘intersex’ and so display female sexual characteristics, including female reproductive anatomy. Some males also produce vitellogenin, a protein normally found in eggs that can be induced in males by hormone exposure’.

Another large study of this problem in 2004 by the UK government’s Environment Agency found that 86% of male fish sampled at 51 sites around the country were intersex.” This phenomenon is blamed upon pollution of the contraceptive pill and its API, ethynyl oestradiol.

This awareness has led to a number of initiatives to try to better understand the consequences of pharma production on the environment and how this can be mitigated.

An early initiative was the European Commission’s environmental risk assessment of pharma products (ERAPharm). Between 2004 and 2007, ERAPharm tracked the fate and effect of pharma products in the environment in order to educate and inform legislators. It primarily focused on three compounds: the  $\beta$ -blocker atenolol, fluoxetine, an anti-depressant, and the veterinary parasiticide ivermectin.

In Europe, this was followed by, among others, commitments by the European Federation of Pharmaceutical Industries and Associations (EFPIA) to reduce the presence of pharmaceuticals in the environment.

Unfortunately, EFPIA’s primary course of action seems to be to push the burden of responsible pharma disposal to patients, according to Maghear, ‘This moves focus away from the fact that pharmaceutical companies should be cleaning up their own production and supply chains and investing in biodegradable pharmaceuticals’.

She believes: "Solely focusing on one pathway, as the EFPIA declaration suggests, will not ensure long-term protection of the environment."

However, despite recognition of the destructive impact the pharma industry has on the environment, the US Food and Drug Administration and European Medicines Agency have not moved to include environmental standards in their good manufacturing practices guidelines.

In addition, there is a lack of legislation and regulation on a local, regional and global level focusing on reducing the negative impact of the pharmaceutical industry on the environment; for example, Maghear explains there is no legislation requiring pharma companies to report environmental incidents.

Non-governmental organisation (NGO) Changing Markets, which has organised awareness campaigns on the issue of pharmaceuticals in the environment agreed, telling The Bureau of Investigative Journalism in January: "There is a crying lack of transparency about pharmaceutical supply chains which means that we know practically nothing about where our drugs are made. This is a scandal and pharmaceutical companies will face increasing calls to do something about it."

The main role of HCWH Europe's Safer Pharma campaign, according to Maghear, is 'to push the EU to be the first region to legislate on pharmaceutical pollution – leveraging health professionals' leadership role in tackling this issue'. They have made some progress, however, there is a long way to go and environmental breaches continue to occur across the world.