

Ecologistas en Acción welcomes the opportunity to contribute to the public consultation on the proposed Roadmap “towards a more comprehensive framework on endocrine disruptors” and demands the Commission to take swift action to protect human health and the environment from the risk caused by endocrine disruptors.

We are concerned that the Roadmap focuses on the need for further research to clarify uncertainties related to endocrine disruptors instead on focusing on measures to reduce the exposure to these chemicals.

The 7th Environmental Action Program, adopted by the European Parliament and the Council already called for action to reduce the exposure to these chemicals and although uncertainties still remain, as with any field of knowledge, existing evidence warrants the need to take prompt action to reduce the exposure to these chemicals of people, in particular most vulnerable groups such as children and pregnant women, and the environment.

The Roadmap indicates different legal pieces of the EU which cope with EDC directly (biocides, plant protection and REACH) and those that can regulate them without having specific rules, such as the cosmetics Regulation. However, it does not mention the Commissions delay in taking action to regulate EDC in these products as established by the law.

We do not agree with Roadmap’s consideration that the EU has “today a comprehensive set of legislative measures is in place, based on the precautionary principle, to provide a high level of protection of citizens and the environment from risks caused by exposure to all chemicals, including those with endocrine disrupting properties”. Unfortunately, EDCs are not covered horizontally in all environmental, health, products, consumer and industrial legislation. To mention a few examples, EDCs are not covered by toys, textiles, furniture and other consumer products regulations, not covered by regulations to protect the aquatic environment, regulations on waste or regulations on pharmaceuticals.

The Roadmap does not add anything about the need to set horizontal criteria for all sectorial legislation based on the premise that the same substance has the same hazard in all uses.

The Roadmap indicates that EDC is an issue of extreme complexity and citizens demand reliable information. Without forgetting the complexity of these substances, we have to remember that complexity is not an exemption for the action of the legislator, especially when this characteristic should trigger the application of the precautionary principle. Probably, citizen’s demand is that the Commission and the regulatory advisory bodies (EFSA, ECHA, etc.) do their work; so that the roadmap should be aimed to regain citizens’ confidence in the information provided is true and independent.

The Commission justifies that the result of the initiative should be a Communication as the best way to approach EDC. Here, the European institution distances itself from the conclusions of the European Union Council, dated on 19 December 2016. In its seventh point, related to EDCs, it invites the Commission, in coherence with the 7th EAP, to update the 1999 EDC Strategy, not to implement a Communication.

The Roadmap focuses on completing EDCs knowledge gaps. We agree that further research is needed for reducing the uncertainties and preventing damages to the human health and environment. However, this must not be an excuse for delaying the decision-making process by the European legislator. The Commission does not have to link its competence exercise to the art-state of science. In spite of both concepts going together, the implementation of legal measures is a political activity that spills over the scientific knowledge.

Contrary to the 7th EAP and the Council's conclusions, the Roadmap does not mention any measures to reduce the exposure to EDC, the 'polluters pay' principle, establishment of taxes for using these chemicals, or their inclusion under the ecolabel rules. , The Commission has the obligation to develop and implement a new strategy on EDC that should focus on reducing exposure and include:

1. Consideration of public health and precaution as the cornerstones of the new EU EDC Strategy.
2. Enhanced public awareness of EDCs -connect it with the EU's work on protecting citizen's health.
3. Improved regulation: Increase the control of the use of EDCs across all sectors.
4. Reduce our EDC daily cocktail: Replace the substance-by-substance approach by including all possible sources of exposure to multiple chemicals.
5. Speed up testing, screening and identification of EDCs.
6. Work towards a clean 'Circular economy' and a non-toxic environment: avoid toxic substances such as EDCs in products from the start.
7. Enhance European market leadership for safer substitution and promotion of innovative solutions.
8. Monitor the health and environmental effects of single, groups and mixtures of ED substances to capture all the sources of EDC exposure 'across the board' and respond swiftly to minimize them.

