



WECF, Women Engage for a Common Future

Comments on EU Commission`s "Roadmap: Towards a more comprehensive EU framework on endocrine disruptors"

areas(201res(2018)3295383:

https://ec.europa.eu/info/law/better-regulation/initiative/255075/attachment/090166e5bba46e82_en

General Comments

WECF (Germany) welcomes the EU Commission Roadmap as a step to take action on the topic of endocrine disrupting chemicals, EDCs. WECF encourages the European Commission to use the chance for creating a strong and effective EU wide strategy, which makes a difference for minimizing the exposure on EDCs and guaranteeing a high level of protection of environment and humans, especially for (the) vulnerable groups such as pregnant women, babies and children.

EDCs can be found everywhere in everyday products, also in recycled products ones. They end up in all of us – children and adults alike – contaminating our bodies without our consent or knowledge and could lead to disorders and diseases decades later in life. Exposure to little doses can have negative impacts. Pregnant women are one of the most vulnerable groups to be protected; they forward their toxic mix to their children, our next generation. In 2015 over 100 national societies of obstetricians and gynaecologists from around the world stated, that more or less every child is born pre-polluted, and called on policymakers to prioritize reducing exposures as an important means of disease prevention¹.

There is enough scientific evidence to take the concerns of more than 300.000 EU citizens seriously, who signed a petition for better protection from EDCs. An EU communication is a step in the right direction, but even more concrete action and measures are needed, for providing real protection from EDCs.

WECF encourages the Commission to develop a EU wide EDC Strategy, include a concrete action plan aiming for a high level of protection for human health, especially vulnerable groups, and the environment. This strategy also could be a basis for member states, which do not run national actions plans on EDCs, such as Germany.

EU-EDC strategy

The European EDC Free Europe coalition, that WECF is a member of, recently called on the EU Commission President Jean-Claude Juncker to bring out a fully-fledged strategy before the summer of 2018. The [joint position of the Coalition](#) presents **8 essential elements for a new European EDC**

¹ Download FIGO Statement: <https://escholarship.org/uc/item/2932t6db>

Strategy, which should be included in the roadmap² (<http://www.edc-free-europe.org/wp-content/uploads/2018/05/EDC-Free-statement-on-EU-EDC-Strategy-final-EN1.pdf>).

Focusing on better protection human health, including of the most vulnerable groups, and better awareness raising among citizens, an **EU EDC Strategy** should include:

- Public health, precaution and exposure reduction as cornerstone of a new EU EDC strategy by building on and expand the short-, medium- and long-term actions from the 1999 EU EDC strategy and augment their effectiveness.
- Transparent and clear information on the presence of EDCs in everyday products and in the environment, to be able to take appropriate measures for limiting its exposure.
- Enhancing public awareness of EDCs: informing parents before and during pregnancy, and families in general, about ways to minimize exposures in everyday life; dissemination of good practice for exposure reductions and health; information and training materials for medical, health and educational professionals and multiplier groups so that they can advise the public on reducing their exposures.
- a response to consumers' concerns and the provision of tools for traceability and the right to know for chemicals in products.

Furtheron the EU EDC Strategy should: improve regulation and control the use of EDCs across all sectors; replace the regulatory substance-by-substance approach by regulation of problematic groups of EDCs; speed up testing, screening and identification; encourage the substitution of EDCs, including supporting the development of chemical and non-chemical alternatives and the exchange of good/best practices at EU level.

A Strategy in a context of a toxic-free future

The future EDC Strategy should be consistent with the global need to reduce exposure to a range of chemicals of concern. The EU should seek cooperation with existing bodies involved on EDCs, such as UNEP, WHO, the Endocrine Society, etc. Elements such as the effect of chemical mixtures, the fate of recycled materials, the effect of (very) low doses of chemicals, the sensitivity of vulnerable populations, etc. should be key elements of the future Strategy.

We hope, that you take the chance to develop a strong EDC strategy, which will stop exposure on EDCs to the most vulnerable groups and to all European citizens.

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² <http://www.edc-free-europe.org/wp-content/uploads/2018/05/EDC-Free-statement-on-EU-EDC-Strategy-final-EN1.pdf>