

EEB CONTRIBUTION TO THE PUBLIC CONSULTATION TOWARDS A MORE COMPREHENSIVE FRAMEWORK ON ENDOCRINE DISRUPTORS

The European Environmental Bureau (EEB) welcomes the opportunity to contribute to the public consultation on the proposed Roadmap “towards a more comprehensive framework on endocrine disruptors”. The EEB supports initiatives to regulate EDCs in a more comprehensive manner in order to guarantee a high protection of health and the environment in line with the Founding treaties.

Nevertheless, **the roadmap lacks of strategy, goals and intention to propose any concrete measure to reduce exposure** to endocrine disruptor chemicals (EDCs) and an ambitious and forward-looking approach to one of the greatest environmental health threats for the future generations. Instead, what the Commission is proposing is focused on compiling information on scientific knowledge, existing policy and legislative measures and cooperation. Although we agree with the Commission that gathering this information is needed, in our view there is already enough science to take action. We therefore ask the Commission **to build an actual strategy and take concrete ambitious measures in order to build a truly comprehensive strategy on EDCs and reduce exposure to EDCs without further delay.**

A proposal for a status quo?

The 7th Environmental Action Program, adopted by the European Parliament and the Council upon initiative of the Commission contains a Priority objective 3: To safeguard the Union’s citizens from environment-related pressures and risks to health and well-being. It recognises the uncertainty about the full impacts on human health and the environment of the combined effects of different chemicals (mixtures) and chemicals that interfere with the endocrine (hormone) system (endocrine disruptors) and chemicals in products and that research indicates that some chemicals have endocrine-disrupting properties that may cause a number of adverse effects on health and the environment, including with regard to the development of children, potentially even at very low doses, and that such effects warrant consideration of precautionary action.

In light of this, the 7EAP demands efforts to be stepped up: to ensure that, by 2020, all relevant substances of very high concern, including substances with endocrine-disrupting properties, are placed on the REACH candidate list; to further develop and implement approaches to address combination effects of chemicals and safety concerns related to endocrine disruptors in all relevant Union legislation and to set out a comprehensive approach to minimising exposure to hazardous substances, including chemicals in products. However, the Commission does not seem to be willing to fulfil these important commitments in its roadmap.

The EEB expects that the further actions announced by the Commission will enable the institution to finally deliver on its commitments under the 7th EAP within the set 2020 timeframe in order to protect the environment and health from the risk posed by EDCs. Addressing knowledge gaps, adequate implementation of the current framework, global cooperation and communication activities should be considered as valid means to attain an overarching objective that is reducing the exposure to endocrine disruptors, but still insufficient. **The Commission’s roadmap fails to commit to concrete actions on the main identified hurdles to allow the EU to provide high levels of protection to human health and the environment and help to achieve the Sustainable Developments Goals (SDGs) and the EU goal of a non-toxic environment, including actions to improve the identification of new SVHCs, in particular EDCs as substances with equivalent level of concern under REACH**

and to address the combined effects of EDCs. This should be done by considering precautionary action in all relevant EU legislation and enshrined into a strong and real strategy, guiding EU Institution actions, rather than a “framework”.

As stated above, we are concerned that the roadmap will mostly consist in an assessment of the existing science/information, neglecting regulatory and policy actions to truly manage the risks and hazards of EDCs. We want to draw the Commission’s attention to the recent UN Environment Overview Reports¹ compiling existing global information on EDC science as well as on regulatory frameworks, including in the EU. National initiatives in France, Belgium, Denmark, Sweden have also established measures to frame EDCs and compiled information. This should enable the EU to focus more on policy and regulatory actions rather than dedicating time and resources to compiling already existing information.

Furthermore, we do not share the view that endocrine disruptors are properly addressed under the current legislative framework and *“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”* as stated in the Roadmap document. This fact actually grounds the high concerns of European citizens over EDCs. The Roadmap rightly questions the “sufficient coherence” of the current legal framework, but we believe that the current framework is furthermore insufficient. **Indeed, actions to address combination effects of EDCs, EDCs in articles, in food contact materials, in cosmetics, in pharmaceuticals, in fertilisers have not yet been endeavoured and do not enable a horizontal approach to regulate EDCs properly. This is contrary to the commitment formulated in the 7th EAP to “set out a comprehensive approach to minimising exposure to hazardous substances, including chemicals in products”.**

Finally, according to the Commission, the initiatives conducted so far enable the EU to be considered as “one of the most protective globally” while other entities barely regulate EDCs in very limited areas. The Commission should safeguard its reputation by focusing on adopting actions that best guarantee a high level of protection of health and the environment and ensure being a global frontrunner.

The way forward: an EDC strategy to reduce EDC exposure

The EEB expects the Commission to commit to a real strategy with **specific objectives and actions to propose a truly comprehensive framework on EDCs**, under particular **agenda** and concrete **budget** and **timelines**.

Under the 7th EAP, EU institutions had committed that “efforts need to be stepped up to ensure that, by 2020, *all relevant substances of very high concern*, including substances with endocrine-disrupting properties, are placed on the REACH candidate list”. The 7th EAP commitment to identify long term actions with a view to reaching the objective of a non-toxic environment should also be the basis for the Commission’s actions (Priority Objective 3, 54.(b)).

¹ [Overview Report I: Worldwide initiatives to identify endocrine disrupting chemicals \(EDCs\) and potential EDCs as of July 2017,](#)

[Overview Report II: An overview of current scientific knowledge on the life cycles, environmental exposures, and environmental effects of select endocrine disrupting chemicals \(EDCs\) and potential EDCs as for July 2017,](#)
[Chemical Fact Sheets as of July 2017](#)

[Overview Report III: Existing national, regional and global regulatory frameworks addressing Endocrine Disrupting Chemicals \(EDCs\) as for July 2017](#)

A comprehensive framework on EDC **should take the form of an EDC strategy as announced on the 4th of July 2017²**. We believe that addressing all relevant SVHC requires a horizontal and integrated approach in order to regulate efficiently and in a sound manner EDCs, which is not the approach currently taken. The priorities of this horizontal strategy should mainly be to:

- minimise the exposure to EDCs in all relevant regulations;
- apply a precautionary approach in all relevant legislation;
- address cocktail effects in all regulations;
- ensure science-based regulatory actions, while promoting further science developments in the area;
- adopt harmonised scientific EDC criteria applicable to all relevant EU laws;
- place the burden of proof on the economic operator, not the public and
- increase transparency on the presence of EDCs in consumer products.

In this case, the better Regulation tool should be an opportunity to set a comprehensive framework taking into account the concerns expressed during the public consultation consistently with objective 2.1 of the Better Regulation Communication (Consulting more listening better).

Moreover, the EEB asks that the Commission takes into account the 8 demands voiced by the EDC-Free coalition³ that are to:

Consider public health and precaution as the cornerstones of a new EDC strategy

- 1. Consider public health and precaution as the cornerstones of a new EDC strategy**
- 2. Enhance public awareness of EDCs - connect it with EU's work on protecting citizen's health**
- 3. Improve 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 with no regrets and promotion of innovative solutions**
- 8. Monitor the health and environmental effects of single, groups and mixtures of ED substances to capture all sources of EDC exposure 'across the board' and respond swiftly to minimise them**

² European Commission, Press release, Endocrine disruptors: major step towards protecting citizens and environment, Brussels, 4 July 2017, http://europa.eu/rapid/press-release_IP-17-1906_en.htm

³ <http://www.edc-free-europe.org/wp-content/uploads/2018/05/EDC-Free-statement-on-EU-EDC-Strategy-final-EN1.pdf>