

Endocrine Disrupting Chemicals under REACH: Four Priority Areas for Regulation

Without Harm

Endocrine disrupting chemicals (EDCs) have been linked with several health problems including the deterioration of male reproductive health, the increased incidence of hormone related cancers and the increase in cardiovascular disease, obesity and diabetes. Despite this growing weight of evidence, the EU has been very slow in regulating EDCs. We therefore call upon the European Commission, Member States and relevant European institutions to:

ACT NOW: Expedite the use of REACH to reduce exposure to EDCs

Chemicals with ED properties should be subject to restrictions or authorisation and phased out without delay. Priority should be assigned based on their hazardous properties and the likelihood of coming into contact with the public, particularly with vulnerable populations such as infants, children, women of childbearing age and pregnant women, or the environment. SIN List 2.0 is a good starting point for identifying priority chemicals for stricter control under REACH, as it shows that the Commission and Member States can act now despite the fact that an EU wide approach for identifying EDCs is not in place yet.

PLAY IT SAFE: Replace EDCs with safer alternatives whenever they exist

The Commission shall review by June 2013 the conditions for granting authorisations to chemicals with ED properties under REACH. Given the possibility of mixture effects, the goal should be the elimination of exposure to chemicals with ED properties. This review should ensure that:

- ▲ ED properties are recognised under a distinct and additional criterion in Article 57 for naming a chemical as a SVHC and separated from the Equivalent Concern criterion (57f).
- An authorisation can only be granted for a limited period if no safer alternatives are available and the use is absolutely essential to society.
- △ CMR chemicals with ED properties be proposed on the basis of both 57c and f.

This document is intended to be read in conjunction with the more comprehensive "Requirements for the proper regulation of chemicals with endocrine disrupting properties" position paper.

PROVIDE TRANSPARENCY for citizens: Disclose information on EDCs

Sufficient information to allow chemical users and consumers to make informed choices must be publicly available on ECHA's website. Member States should make information available about EDCs present in consumer and industrial goods and how citizens and workers can protect themselves from them.

GET THE CRITERIA RIGHT: Develop comprehensive criteria for identifying chemicals with ED properties to be used across all relevant EU legislation

- Public interest stakeholders must be involved in the development of the criteria currently being elaborated in the EU, which will have implications for several policies.
- ▲ The absence of precise scientific knowledge of how a substance with endocrine properties exerts its effects (mechanisms of action) should not hinder or retard the regulation of such a chemical.
- ▲ Independent peer reviewed studies (including non-GLP ones) should be considered when assessing whether a chemical has ED properties and its likely effects to humans and the environment.
- Apply the precautionary principle in the identification of ED chemicals.

We therefore call upon the European Commission, Member States and the relevant European institutions to achieve the above by 2013.

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