Open letter to Mr. Nicolas Hulot, French Minister responsible for environment

21 June 2017

Dear Minister,

We are writing to you on behalf of the EDC Free Europe coalition¹, which represents 70 civil society groups – trade unions, consumers, health professionals, cancer organisations, environmental groups and women's groups – and promotes ambitious policy measures in order to reduce human and environmental exposure to endocrine disrupting chemicals.

We are surprised and concerned to learn - through an article published in Le Monde² - that France could in the coming days vote in favour of the European Commission proposal for the elaboration of identification criteria for endocrine disruptors in the context of the EU regulation on pesticides. We call on you to reject this proposal in order to honour the electoral promises of Emmanuel Macron³ and the ambitious approach that France has adopted so far in support of criteria that can be used in a practical and pragmatic way. We hereby acknowledge the remarkable work done by the French delegation at the European Chemicals Agency, which resulted in the long overdue recognition of Bisphenol A as a substance of very high concern for its endocrine disrupting properties for human health last week⁴. The difficulties to reach a consensus on the identification of this substance despite the significant level of scientific studies available about its negative effects is yet another illustration of the urgency to act towards swifter identification of endocrine disruptors.

The proposal for the EU criteria currently on the table is insufficient, impracticable and most importantly not based on science⁵. Should it be adopted, it would require too high a burden of proof to be able to identify substances, while allowing an extremely worrying exemption for numerous pesticides that have an effect on the endocrine system. It would neither allow reducing citizens' exposure, nor avoiding the resulting adverse health effects and their costs (which are estimated to

¹ http://www.edc-free-europe.org/about-us/

² Le Monde, Stéphane Foucart, Stéphane Horel, "Perturbateurs endocriniens: les scientifiques alertent sur le laxisme de Bruxelles", 17 June 2017, http://mobile.lemonde.fr/planete/article/2017/06/17/perturbateurs-endocriniens-les-scientifiques-alertent-sur-le-laxisme-de-bruxelles 5146113 3244.html

³ En Marche, presidential programme of Emmanuel Macron : « Nous fixons le cap de protéger les Français de leur exposition aux perturbateurs endocriniens, autres que les pesticides, nous interviendrons avec fermeté au niveau européen pour revoir totalement les méthodes d'évaluation des produits» ; https://en-marche.fr/emmanuel-macron/le-programme/environnement-et-transition-ecologique

⁴ https://env-health.org/resources/press-releases/article/eu-finally-recognises-bisphenol-a

⁵ The Endocrine Society, The European Society of Endocrinology, The European Society for Paediatric Endocrinology, Lettre aux ministres européens de l'environnement, 15 juin 2017, http://bit.ly/2t914p5

amount to 163 billion euros a year⁶) – which would be in total contradiction to the commitments made at the European level through the 7th Environmental Action Plan in 2013⁷.

At a time when the European project is seriously being challenged, the elaboration of ambitious criteria represents a unique opportunity to demonstrate its added value and could create a worldwide precedent in order to really protect our health and that of future generations. 90% of French citizens are in favour of your government continuing and strengthening policies to fight against endocrine disruptors at the national and European levels⁸. This is why, in view of the meeting of the European pesticides committee scheduled for 4 July, we ask you to maintain the firm position that France has adopted so far and to reject the proposal currently on the table. It is still time to make a difference and France's role on this issue is fundamental.

Yours sincerely,



Genon K. Jensen
Executive Director,
Health and Environment Alliance

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François Veillerette President, PAN Europe

On behalf of the EDC-Free coalition



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⁶ Léo Trasande and others, "Burden of Disease and Costs of Exposure to Endocrine-Disrupting Chemicals in the European Union: an updated analysis", https://www.ncbi.nlm.nih.gov/pubmed/27003928

⁷ Decision No 1386/2013/EU of the European Parliament and of the Council of 20 November 2013 on a General Union Environment Action Programme to 2020 'Living well, within the limits of our planet"

⁸ Opinion survey performed by IFOP, on behalf of Générations Futures, published on 21 June 2017. Available at www.generations-futures.fr