

HEAL's response to the French public consultation on its draft national action plan on endocrine disrupting chemicals



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France's initiative to update its national action plan on endocrine disrupting chemicals (EDCs) can be an inspiring driver for European action towards the reduction of exposure to toxic chemicals, and shows that member states can take important steps to protect their population from hormone disruptors.

As part of the development of a second national strategy for action on endocrine disrupting chemicals (EDCs), the French authorities opened their draft action plan [up for public consultation](#). The Health and Environment Alliance (HEAL) welcomes the French commitment to act in order to further identify, regulate and inform the public on EDCs.

HEAL's comments are [available here](#) and are in line with both HEAL's vision for a [non-toxic environment](#) and the [EDC-Free Europe demands](#) relating to the development of a future European EDC strategy. They are also complementary to the comments submitted by our French members [Génération Futures](#), [WECF France](#), [RES France](#), and [France Nature Environnement](#).

A SUMMARY OF HEAL'S COMMENTS

The strategy is being developed in a context of important European developments, in particular following the European Commission Communication on a new EDC strategy. While this Communication has not yet been adapted into a fully-fledged workplan with a timeline for implementation, **an ambitious French action plan can lead the way towards increasing national initiatives in order to reduce our daily dose of EDCs**. It should be used by France together with other willing member states to push for further identification, regulation and prevention at the European level in the next years.

We particularly welcome the following aspects:

- The focus on the protection of the population as part of the strategic objective 1, which should guide all other objectives and measures in the future plan. Delivering on this aspect requires committing to reducing exposure, including for vulnerable groups such as pregnant women, young children, teenagers, or residents in industrial zones or highly intensive agriculture areas.
- The commitment to evaluate a fixed number of substances for ED properties every year (6 substances per year in 2019-2020 and 9 substances per year from 2021). This is crucial in order to accelerate the identification and regulation of endocrine disruptors both at national and European levels. The French commitment to establish a list of suspected, presumed, and known EDCs will also be of great regulatory use in the future.

- The commitment in favour of a harmonised set of European regulations, with particular attention to vulnerable groups as well as the promotion of a regulatory approach that puts EDCs at the same level of substances of very high concern for human health and the environment.
- The commitment to inform the public and train professionals. Training health professionals as well as using their voice to further inform the public about EDCs is an important priority for meaningful reduction of ED exposure according to HEAL.

We believe that the following aspects deserve improvement and clarifications:

- Regulatory aspects:
 - Clarify that EDC regulations must be developed assuming that there is no safe level of exposure. This why the precautionary principle must be applied in order to prevent exposition at the source as much as possible. This is particularly important considering weaknesses that HEAL, other civil society groups and scientists have highlighted in relation to the identification criteria for ED pesticides and biocides.
 - Clarify the commitment to regulating substances by groups rather than individually in order to avoid regrettable substitution and defend this approach at the European level.
 - Clarify the comment to take into account the “cocktail effect” of our daily human exposure to EDCs in the regulatory processes at the French and European levels.
 - Clarify the commitment to supporting the development of new regulations in sectors that currently lack adequate protection for the population, with a priority for consumption products (food contact materials, textiles, plastic products across the board).
- Information and awareness-raising:
 - Clarify the commitment to focus on and direct information towards populations that are most at risk, e.g. parents before and after birth, or families.
 - Pay particular attention to avoid that public awareness-raising initiatives do not contribute to allowing producers to escape their responsibility to avoid consumers’ exposure to EDCs.
 - Prefer the development of a unique et mandatory product labelling on the presence of suspected, presumed, or known EDCs in products according to the development of the French list of such chemicals over tying progress on labelling to progress made in European and international discussions on labelling. Labelling must be developed for all the products that are a channel for significant exposure, such as food (and food packages), care and cosmetic products, children’s articles, toys or textiles.
 - Mention the ‘right to know’ in the development of tools to develop ED tracing in products.
- Substitution:
 - Replace industry voluntary commitments by a mandatory substitution approach in cases of known, presumed or suspected hazard of substances. Without mandatory measures, producers will always have reasons to delay substitution and find excuses to challenge the

evidence base to promote substitution. The development of a unique “EDC-free label” is preferable to the multiplication of labels for different groups of substances (e.g. “phenol free” that is mentioned in the proposal) that risk increasing consumers’ confusion.

- Clarify that substitution is part of a broader effort to reduce exposure to chemicals and must be listed in the strategic objectives. To be successful, substitution must encourage the development of non-chemical options when these are available in order to avoid regrettable substitutions.

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Health and Environment Alliance (HEAL)

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health. HEAL’s EU Transparency Register Number: 00723343929-96. More information: www.env-health.org

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