



Response to European Commission Roadmap, “Harmful chemicals – endocrine disruptors, review of EU rules”, July 2019

The Health and Environment Alliance (HEAL) welcomes the opportunity to comment on this roadmap. As we have stressed on numerous occasions, concrete action to prepare the next European strategy on endocrine disrupting chemicals (EDCs) is long overdue and more necessary than ever.

Chronic human exposure to [low doses](#) of EDCs has been linked with a number of health conditions including: metabolic disorders, impacts on neurodevelopment, impacts on the thyroid function, reproductive disorders, cardiovascular effects, hormonal cancers. The World Health Organization and the UN Environmental Program go as far as talking about “[a global threat that needs to be resolved](#)”. There is already sufficient evidence to describe the inappropriateness and gaps that exist in European regulations in relation to endocrine disruptors as well as the significant burden of diseases that these gaps are creating - according to a conservative estimate, the costs that can be attributed to EDC exposure are at [least 163 billion euros a year in Europe](#) and a recent EU-funded research [project](#) also highlights that health risks associated with combined exposures to endocrine disruptors are systematically underestimated. As illustrated by a recent editorial published in [The Lancet Diabetes & Endocrinology](#) (May 2019), the alarm from the scientific and medical community about the lack of concrete action to truly minimise people’s exposure to EDCs is clear:

“EDCs represent not just a public health problem or indeed a global health problem, but a planetary health problem. Calls to better regulate EDCs and minimise human exposure must be heard and acted on by governments and policymakers. The role of EDCs as potential drivers of the burgeoning epidemic of non-communicable diseases (NCDs) must also be recognised and taken into account in NCD prevention strategies.”

The longer the European Commission shies away from taking action, the higher the costs for society will be. In this context, we are concerned that the main proposal of the European Commission revolves around the development of yet another fitness check with the aim to “contribute to the assessment of whether EU chemicals legislation delivers its objective to protect human health and the environment by minimising the overall exposure to endocrine disruptors”. Far from another evaluation, what is now needed from the European Commission is a plan of concrete actions to address existing gaps as well as a clear timeline to do so.

The following calls and evidence base are relevant in this regard:

- [Environment Council Conclusions on chemicals](#), 26 June 2019
“URGES the Commission to ensure a high level of protection of human health and the environment by minimising exposure to endocrine disruptors, as endorsed by the 7th EAP, and by stimulating substitution by safer chemicals, as far as technically and practically possible, and to provide, without undue delay, an action plan with clear and concrete measures and an ambitious timeline for doing so”.
- [European Parliament resolution](#) on endocrine disruptors, 15 April 2009
“Calls on the Commission to swiftly take all necessary action to ensure a high level of protection of human health and the environment against EDCs by effectively minimising overall exposure of humans and the environment to EDCs”.
- [European Parliament study](#), ‘Endocrine Disruptors: from Scientific Evidence to Human Health Protection’, European Parliament, Directorate-General for Internal Policies, Policy Department for Citizens’ Rights and Constitutional Affairs”, 15 January 2019.

As highlighted on numerous occasions, priority issues to be dealt with should notably include:

- **Closing regulatory gaps** that currently leave human health unprotected, in particular when it comes to food contact materials, toys, and cosmetics;
- **Addressing the current lack of horizontal definition** for EDCs across regulations;
- **Ensuring coherence across regulations** when it comes to dealing with EDCs, e.g. automatically translating the identification of ED substances under one regulation into other regulations covering the same substances across different uses, ensuring that identified SVHCs for their endocrine disrupting properties are banned from use in consumer products such as food packages. This is particularly important in the context of ever increasing use of materials that contain ED substances such as plastics, which are regulated by various regulations depending on their use and their primary or recycled nature.
- **Continuously updating data requirements** in relation to endocrine disruptors across regulations to allow for EDC identification. In this regard, steps need to be taken as soon as possible in the REACH, biocides and pesticides regulations;
- Clarifying how the European Commission plans to **address potentially difficult situations to adequately test EDCs**, in particular in the context of the cosmetics regulation that foresees a ban on animal testing, while we know that current alternative test methods are not adequate to detect adverse impacts in intact organisms and no validated non-animal alternative test methods exist for systemic toxicity;
- **Taking into account suspected EDCs** in the next European strategy, in order to ensure coherence with the EU approach to carcinogens, mutagens and reprotoxic substances and to regulate according to the precautionary principle that is enshrined in the EU Treaties and should guide the EU action in the context of ever growing scientific evidence

on the presence of EDCs in our environment and the related health effects of our exposure.

Finally, we would like to use the opportunity of this consultation to stress that:

- It is unclear from the proposed roadmap what knowledge the fitness check would add that is not already known from Council and Parliament demands for action as well as on how to address gaps already pointed therein;
- It is unclear and vague from the proposed roadmap how stakeholder consultations will be implemented (who, when, and how) and how the stakeholder forum previously announced by the European Commission for the fall 2019 will fit in these consultations.

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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 over 70 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future. HEAL's EU Transparency Register Number: 00723343929-96