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Date: 19/02/2020 10:05:21

# Fitness Check of EU legislation with regard to Endocrine Disruptors - Public Consultation

### Introduction

### Scope and objectives

Endocrine disruptors are chemical substances that interfere with hormones (the endocrine system) and in doing so negatively affect the health of humans and animals. They may either be synthetic or of natural origin. Exposure to endocrine disruptors can occur from different sources, such as from residues of pesticides in our food or from other types of products used or present in our daily life.

On 7 November 2018, the EU Commission, in its communication "Towards a comprehensive European Union framework on endocrine disruptors", confirmed its commitment to protect EU citizens and the environment from endocrine disruptors, by minimising human and wildlife exposure to these substances. The Communication outlines a comprehensive set of actions including a cross-cutting **Fitness Check** of the relevant legislation.

EU legislation regulating chemicals has been developed at different points in time and has, in certain cases, different objectives. This has resulted in different approaches to regulating endocrine disruptors, depending on the sector, and has raised questions as to whether the EU legal framework regulating endocrine disruptors is sufficiently coherent. The Fitness Check aims at analysing the coherence of the different regulatory approaches to the assessment and management of endocrine disruptors and at assessing whether the current legislation delivers on its objectives to protect human health and the environment. The outcome of the Fitness Check will inform potential improvements of the regulatory framework with regard to endocrine disruptors. More information is available in the published Roadmap. Stakeholder consultation is an essential component of the Fitness Check. It aims at gathering inputs from a broad range of stakeholder groups as well as citizens to ensure that views from all interested parties are considered in the evaluation.

The aims of this public survey are:

- To assess public concerns and needs with respect to endocrine disruptors in the EU.
- To evaluate to which extent current EU legislation meets the concerns and needs of citizen.
- To identify opportunities for improvement in the way endocrine disruptors are assessed, managed and potential risks communicated.

### **Target audience**

This survey targets the general public, i.e. **individuals in their own capacity**. The survey is designed from the perspective of a citizen. It does not assume previous experience or specific knowledge on regulatory

risk assessment and management of endocrine disruptors.

If you would like to comment on behalf of an organisation please reply to the <u>Stakeholders Survey</u>. The Stakeholders Survey is open from 06/12/2019 to 31/01/2020.

### About you

- \*Language of my contribution
  - Bulgarian
  - Croatian
  - Czech
  - Danish
  - Dutch
  - English
  - Estonian
  - Finnish
  - French
  - Gaelic
  - German
  - Greek
  - Hungarian
  - Italian
  - Latvian
  - Lithuanian
  - Maltese
  - Polish
  - Portuguese
  - Romanian
  - Slovak
  - Slovenian
  - Spanish
  - Swedish
- \*I am giving my contribution as
  - Academic/research institution
  - Business association
  - Company/business organisation
  - Consumer organisation
  - EU citizen
  - Environmental organisation
  - Non-EU citizen
  - Non-governmental organisation (NGO)
  - Public authority
  - Trade union
  - Other
- \* First name

| Jamie  |  |   |   |
|--|--|---|---|
| Surname  |  |   |   |
| PAGE   |  |   |   |
| Email (this won't be p   | ublished)  |   |   |
| jpage@cancerprevention   | nsociety.org                                       |   |   |
| Organisation name  |  |   |   |
| The Cancer Prevention 8  | & Education Society                                |   |   |
|  |  |   |   |
| <ul> <li>Small (10 to 49)</li> <li>Medium (50 to 2)</li> <li>Large (250 or m</li> </ul> Transparency registe 255 character(s) maximum Check if your organisation is on tomaking. | 249 employees)<br>ore)<br>r number                 | voluntary database for organisations          | seeking to influence EU decision-                   |
| 131087519297-40  |  |   |   |
| Country of origin  Please add your country of origin  Afghanistan  Aland Islands   | , or that of your organisation.  Djibouti Dominica | <ul><li>Libya</li><li>Liechtenstein</li></ul> | <ul><li>Saint Martin</li><li>Saint Pierre</li></ul> |
| Albania  | <ul><li>Dominican<br/>Republic</li></ul>           | Lithuania                                     | and Miquelon Saint Vincent and the                  |
| <ul><li>Algeria</li><li>American</li><li>Samoa</li></ul>   | <ul><li>Ecuador</li><li>Egypt</li></ul>            | <ul><li>Luxembourg</li><li>Macau</li></ul>    | Grenadines Samoa San Marino                         |

El Salvador

Equatorial

Guinea

Eritrea

Estonia

Eswatini

Madagascar

Malawi

Malaysia

Maldives

Mali

Andorra

Angola

Anguilla

Antarctica

Antigua and

Barbuda

São Tomé and PríncipeSaudi Arabia

Senegal

Seychelles

Serbia

| <ul><li>Argentina</li><li>Armenia</li></ul>     | <ul><li>Ethiopia</li><li>Falkland Islands</li></ul>                   | <ul><li>Malta</li><li>Marshall<br/>Islands</li></ul> | <ul><li>Sierra Leone</li><li>Singapore</li></ul>                           |
|---|---|--|--|
| Aruba   | Faroe Islands   | Martinique   | Sint Maarten   |
| Australia                                       | Fiji  | Mauritania   | Slovakia   |
| Austria   | Finland   | Mauritius  | Slovenia   |
| Azerbaijan                                      | France  | Mayotte  | Solomon  |
|   |   |  | Islands  |
| Bahamas   | French Guiana   | Mexico   | Somalia  |
| Bahrain   | French  | Micronesia   | South Africa   |
|   | Polynesia   |  |  |
| Bangladesh                                      | <ul><li>French</li><li>Southern and</li><li>Antarctic Lands</li></ul> | Moldova  | <ul><li>South Georgia<br/>and the South<br/>Sandwich<br/>Islands</li></ul> |
| Barbados  | Gabon   | Monaco   | South Korea  |
| Belarus   | Georgia   | Mongolia   | South Sudan  |
| Belgium   | Germany   | Montenegro   | Spain  |
| Belize  | Ghana   | Montserrat   | Sri Lanka  |
| Benin   | Gibraltar   | Morocco  | Sudan  |
| Bermuda   | Greece  | Mozambique   | Suriname   |
| Bhutan  | Greenland   | Myanmar  | Svalbard and   |
| Delivie   | Oronada   | /Burma<br>Namihia                                    | Jan Mayen  Sweden  |
| <ul><li>Bolivia</li><li>Bonaire Saint</li></ul> | Grenada   | - I tarribia   | Circucii   |
| Eustatius and<br>Saba                           | Guadeloupe  | Nauru  | Switzerland  |
| <ul><li>Bosnia and<br/>Herzegovina</li></ul>    | Guam  | Nepal  | Syria  |
| Botswana  | Guatemala   | Netherlands  | Taiwan   |
| Bouvet Island                                   | Guernsey  | New Caledonia  | Tajikistan   |
| Brazil  | Guinea  | New Zealand  | Tanzania   |
| British Indian                                  | Guinea-Bissau   | Nicaragua  | Thailand   |
| Ocean Territory                                 |   |  | 0 = 1  |
| <ul><li>British Virgin<br/>Islands</li></ul>    | Guyana  | Niger  | The Gambia   |
| <ul><li>Brunei</li></ul>                        | Haiti   | Nigeria  | Timor-Leste  |
| <ul><li>Bulgaria</li></ul>                      | <ul><li>Heard Island</li></ul>  | Niue   | © Togo   |
| Baigana   | and McDonald  | - 11140  | - 1090   |
|   | Islands   |  |  |
| Burkina Faso                                    | Honduras  | Norfolk Island                                       | Tokelau  |
| Burundi   | Hong Kong   | Northern   | Tonga  |
|   |   | Mariana Islands                                      |  |
| Cambodia  | Hungary   | North Korea  | Trinidad and   |
| Cameroon  | Iceland   | North  | Tobago<br>Tunisia  |
| - Jamoroon                                      | - Iodiana   | Macedonia  | - rumija   |
| Canada  | India   | Norway   | Turkey   |

| <ul><li>Cape Verde</li><li>Cayman Islands</li></ul> | <ul><li>Indonesia</li><li>Iran</li></ul> | <ul><li>Oman</li><li>Pakistan</li></ul>     | <ul><li>Turkmenistan</li><li>Turks and<br/>Caicos Islands</li></ul> |
|---|--|---|---|
| <ul><li>Central African<br/>Republic</li></ul>      | Iraq                                     | Palau                                       | <ul><li>Tuvalu</li></ul>  |
| Chad  | Ireland                                  | Palestine                                   | Uganda  |
| Chile   | Isle of Man                              | Panama                                      | Ukraine   |
| China   | Israel                                   | <ul><li>Papua New Guinea</li></ul>          | <ul><li>United Arab</li><li>Emirates</li></ul>                      |
| Christmas   | Italy                                    | <ul><li>Paraguay</li></ul>                  | <ul><li>United</li></ul>  |
| Island  | liary                                    | o i araguay                                 | Kingdom   |
| <ul><li>Clipperton</li></ul>                        | Jamaica                                  | Peru  | United States   |
| Cocos (Keeling)                                     | <ul><li>Japan</li></ul>                  | Philippines                                 | United States   |
| Islands   |  | FF  | Minor Outlying  |
|   |  |   | Islands   |
| Colombia  | Jersey                                   | Pitcairn Islands                            | Uruguay   |
| Comoros   | Jordan                                   | Poland                                      | US Virgin   |
|   |  |   | Islands   |
| Congo   | Kazakhstan                               | <ul><li>Portugal</li></ul>                  | Uzbekistan  |
| Cook Islands  | <ul><li>Kenya</li></ul>                  | Puerto Rico                                 | Vanuatu   |
| Costa Rica  | <ul><li>Kiribati</li></ul>               | O Qatar                                     | Vatican City  |
| Croatio   | ○ Kosovo                                 | Réunion                                     | <ul><li>Venezuela</li></ul>   |
| Croatia   | <ul><li>Kuwait</li></ul>                 | <ul><li>Romania</li></ul>                   | <ul><li>Vietnam</li><li>Wallis and</li></ul>                        |
| Cuba  | Kyrgyzstan                               | Russia                                      | <ul><li>Wallis and<br/>Futuna</li></ul>                             |
| Curação   | Laos                                     | Rwanda                                      | <ul><li>Western</li></ul>   |
| - Garação   | Luoo                                     | - Hwanaa                                    | Sahara  |
| Cyprus  | Latvia                                   | Saint                                       | Yemen   |
| <b>71</b>   |  | Barthélemy                                  |   |
| Czechia   | Lebanon                                  | Saint Helena                                | Zambia  |
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| <ul><li>Democratic<br/>Republic of the</li></ul>    | Lesotho                                  | <ul><li>Saint Kitts and<br/>Nevis</li></ul> | Zimbabwe  |
| Congo   |  | INCVIO                                      |   |
| <ul><li>Denmark</li></ul>                           | Liberia                                  | Saint Lucia                                 |   |
|   |  |   |   |

# Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

### Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

### Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

| ■ I agree with the <u>personal data protection provisions</u> Information on endocrine disruptors  |
|--|
| 1) How well informed are you about endocrine disruptors?  Output  Outp |
| 2) Where do you get information about endocrine disruptors from? More than one answer is possible.  © European Commission and EU agencies  National authorities in your country  Specialised scientific sources  Education and training sources  General news coverage  Social media  Other sources (please specify below)  I do not look for information on endocrine disruptors  |
| Other sources: 50 character(s) maximum  PUBMED, NGOs   |
| <ul> <li>3) How well informed are you about the decisions made in the EU with regard to endocrine disruptors?</li> <li>Not at all, I trust regulators to make the right decisions to keep me safe</li> <li>Somewhat informed</li> <li>Very well informed</li> <li>Don't know</li> </ul>  |
| <ul> <li>4) Do you think that the effects of endocrine disruptors on public health and the environment are understood?</li> <li>Yes</li> <li>Yes to some extent</li> </ul>   |

Effectiveness of EU laws

No

Don't know

5) In your opinion, to which extent do EU laws protect you from exposure to endocrine disruptors through:

|   | Not<br>al<br>all | To a<br>small<br>extent | To a<br>moderate<br>extent | Fully | Don't<br>know |
|---|------------------|-------------------------|----------------------------|-------|---------------|
| Outdoor air   | •                | 0                       | 0                          | 0     | 0             |
| Drinking water (tap water)  | •                | 0                       | 0                          | 0     | 0             |
| Home or office (e.g. furnishing, flooring, paints)                            | •                | 0                       | 0                          | 0     | 0             |
| Food and beverages  | •                | 0                       | 0                          | 0     | 0             |
| Food contact materials including packaging (e. g. plastic films, pizza boxes) | •                | 0                       | 0                          | 0     | 0             |
| Detergents  | •                | 0                       | 0                          | 0     | 0             |
| Medicines   | 0                | 0                       | •                          | 0     | 0             |
| Medical devices (e.g. prostheses, stents, bandages, dental fillings)          | •                | 0                       | 0                          | 0     | 0             |
| Personal care products (e.g. cosmetics, personal hygiene)                     | •                | 0                       | 0                          | 0     | 0             |
| Electric and electronic equipment   | •                | 0                       | 0                          | 0     | 0             |
| Clothes   | •                | 0                       | 0                          | 0     | 0             |
| Others (please specify)   | •                | 0                       | 0                          | 0     | 0             |

#### Other

50 character(s) maximum

No protection from hazadous flame retardants

- 6) In your opinion, how well do EU laws protect you from endocrine disruptors compared to other toxic chemicals (e.g. carcinogenic or mutagenic substances, substances toxic to reproduction)?
  - I am less protected from endocrine disruptors
  - I am protected from endocrine disruptors and other toxic chemicals to the same extent
  - I am less protected from other toxic chemicals
  - Don't know
- 7) The endocrine (hormonal) system controls a large number of processes in the body throughout life from early stages such as embryonic development and puberty, to later ones such as reproductive life and old age. Considering different life stages, in your opinion how well do EU laws protect citizens from effects of endocrine disruptors?

|  | High level of protection | Moderate level of protection | Low level of protection | Don't<br>know |
|--|--------------------------|------------------------------|-------------------------|---------------|
| Unborn through exposure during pregnancy | 0                        | 0                            | •                       | 0             |
| Newborn up to the age of 3               | 0                        | 0                            | •                       | 0             |
| Children until puberty                   | 0                        | 0                            | •                       | 0             |
| Adolescents                              | 0                        | 0                            | •                       | 0             |
| Pregnant women                           | 0                        | 0                            | •                       | 0             |
| Adults in general                        | 0                        | 0                            | •                       | 0             |
| People at work                           | 0                        | 0                            | •                       | 0             |
| Elderly                                  | 0                        | 0                            | •                       | 0             |
| People with illnesses                    | 0                        | 0                            | •                       | 0             |

- 8) In your opinion, to what extent are endocrine disruptors contributing to some human diseases/health conditions such as infertility, cancer or obesity?
  - Not at all
  - To a small extent
  - To a moderate extent
  - To a large extent
  - Don't know
- 9) In your opinion, how well does EU legislation protect the following categories of wildlife from effects of endocrine disruptors?

|  | High level of protection | Moderate level of protection | Low level of protection | Don't<br>know |
|--|--------------------------|------------------------------|-------------------------|---------------|
| Insects, including bees and other pollinators          | 0                        | •                            | •                       | 0             |
| Other invertebrates, such as snails, shrimps and worms | 0                        | 0                            | •                       | 0             |
| Fish and amphibians                                    | 0                        | 0                            | •                       | 0             |
| Birds and reptiles                                     | 0                        | 0                            | •                       | 0             |
| Mammals  | 0                        | 0                            | •                       | 0             |
| Plants   | 0                        | 0                            | •                       | 0             |

A common goal of EU laws on chemicals is the protection of human health and the environment. This should be achieved through minimising exposure to hazardous chemicals. At the same time EU laws have the goal to improve the free movement of goods in the EU.

Chemicals are managed under different EU laws according to their uses. Some EU laws require specific

assessment of endocrine disrupting properties of the chemicals. Others do not specifically refer to endocrine disruptors but may have links to those laws. Depending on the sector this has resulted in different approaches to endocrine disruptors. This has raised the question as to whether the EU laws are sufficiently coherent with regard to endocrine disruptors.

10) In your opinion, should the EU have the same approach across regulatory sectors (e.g. industrial chemicals, cosmetics, plant protection products, biocides, food) to:

|  | Yes, the same approach should be applied to all sectors | Yes, to the extent possible | No, the approach should be sector specific | Don't<br>know |
|--|---|-----------------------------|--|---------------|
| Identifying endocrine disruptors                       | •   | ©                           | 0  | 0             |
| Managing the risks of exposure to endocrine disruptors | •   | 0                           | 0  | 0             |

11) In your opinion, to which extent do EU laws allow for **identification** of endocrine disruptors in the following sectors?

|                                     | Endocrine<br>disruptors are all<br>identified | Endocrine disruptors are partially identified | Few are identified | None<br>are<br>identified | Don't<br>know |
|-------------------------------------|---|---|--------------------|---------------------------|---------------|
| Pesticides                          | 0   | 0   | •                  | 0                         | 0             |
| Biocides                            | ©   | 0   | •                  | 0                         | 0             |
| Toys                                | ©   | 0   | •                  | 0                         | 0             |
| Detergents                          | ©   | 0   | •                  | 0                         | 0             |
| Fertilisers                         | ©   | 0   | •                  | 0                         | 0             |
| Electrical and electronic equipment | 0   | 0   | •                  | 0                         | 0             |
| Furnishings (home /office)          | 0   | 0   | •                  | 0                         | 0             |
| Food contact materials              | 0   | 0   | •                  | 0                         | 0             |
| Food additives                      | 0   | 0   | 0                  | •                         | 0             |
| Personal care products              | 0   | 0   | •                  | 0                         | 0             |
| Medical devices                     | 0   | 0   | •                  | 0                         | 0             |

| Human and veterinary | 0 | 0 | • | 0 | 0 |
|----------------------|---|---|---|---|---|
| medicines            |   |   |   |   |   |

# 12) In your opinion, to which extent do EU laws **manage the risks** to endocrine disruptors in the following sectors?

|                                     | Well<br>managed | Fairly well<br>managed | Not well managed | Don't<br>know |
|-------------------------------------|-----------------|------------------------|------------------|---------------|
| Pesticides                          | 0               | 0                      | 0                | 0             |
| Biocides                            | 0               | 0                      | •                | 0             |
| Toys                                | 0               | 0                      | 0                | 0             |
| Detergents                          | 0               | 0                      | 0                | •             |
| Fertilisers                         | 0               | 0                      | 0                | •             |
| Electrical and electronic equipment | 0               | 0                      | 0                | 0             |
| Furnishings (home/office)           | 0               | 0                      | •                | 0             |
| Food contact materials              | 0               | 0                      | 0                | 0             |
| Food additives                      | 0               | 0                      | 0                | •             |
| Personal care products              | 0               | 0                      | •                | 0             |
| Medical devices                     | 0               | 0                      | •                | 0             |
| Human and veterinary medicines      | 0               | 0                      | 0                | •             |

# Regulatory testing and animal welfare

EU laws on biocides and pesticides and on chemicals (REACH) require testing for endocrine disrupting properties of a substance. They also specifically ask to minimise the use of vertebrate animals (in accordance with EU laws on the protection of animals used for scientific purposes).

- 13) In your opinion, when testing chemicals for endocrine disrupting properties, is the animal testing minimised in the EU?
  - Not at all
  - Insufficiently minimised
  - Minimised to the extent possible
  - Fully minimised
  - Don't know

# Efficiency of EU laws

Benefits of EU laws include protection of human health and the environment and the free movement of goods in the EU market. Costs can be economic (time, resources) as well as ethical (e.g. use of laboratory animals for testing). Efficiency considers the benefits in relation to costs.

| 14) In your view, are the costs (e.g. time, resources, use of laboratory animals | s) of |
|--|-------|
| the EU laws on endocrine disruptors justified and proportionate for the benefit  | ts    |
| accrued?   |       |

- Not at all
- To a small extent only
- To a moderate extent
- Fully
- Don't know
- 15) In your opinion, to which extent do EU laws on endocrine disruptors generate:

|                                   | Not al<br>all | To a small extent only | To a moderate extent | Fully | Don't<br>know |
|-----------------------------------|---------------|------------------------|----------------------|-------|---------------|
| Costs for the agricultural sector | 0             | 0                      | 0                    | 0     | •             |
| Costs for the industry sector     | 0             | 0                      | 0                    | 0     | •             |
| Costs for citizens                | 0             | 0                      | 0                    | 0     | •             |
| Ethical costs                     | 0             | 0                      | 0                    | 0     | •             |
| Other (please specify)            | 0             | 0                      | ©                    | 0     | •             |

| Oth | her                    |
|-----|------------------------|
| 50  | O character(s) maximum |
|     |                        |

16) In your opinion, to which extent do EU laws on endocrine disruptors generate benefits for:

|              | Not al all | To a small extent only | To a moderate extent | Fully | Don't know |
|--------------|------------|------------------------|----------------------|-------|------------|
| Human health | •          | 0                      | 0                    | 0     | 0          |
| Wildlife     | •          | 0                      | 0                    | 0     | 0          |
| EU market    | 0          | 0                      | 0                    | 0     | •          |

| 17) In you | ır opinion, | who sho   | ould reg | gulate | to prote | ct ped | ople and | d wildlife | from | harm |
|------------|-------------|-----------|----------|--------|----------|--------|----------|------------|------|------|
| caused by  | endocrin    | e disrupt | tors? (r | multip | le answe | ers po | ssible)  |            |      |      |

- Local/regional authorities
- National authorities
- EU authorities

| International organisations         |
|-------------------------------------|
| ■ There is no need to take measures |
| Don't know                          |

### Relevance of EU laws

# 18) In which areas do you see the need for the EU to step up its efforts on endocrine disruptors?

|  | A lot of efforts are needed | Some<br>efforts are<br>needed | The<br>efforts<br>are<br>sufficient | Don't<br>know |
|--|-----------------------------|-------------------------------|-------------------------------------|---------------|
| Identification of endocrine disruptors   | •                           | 0                             | 0                                   | 0             |
| Coherent approach to identification and management of endocrine disruptors across regulatory sectors | •                           | 0                             | •                                   | 0             |
| Reducing exposure of humans  | •                           | 0                             | 0                                   | 0             |
| Reducing exposure of wildlife  | •                           | 0                             | 0                                   | 0             |
| Reduction of burdens and costs to business   | 0                           | 0                             | 0                                   | •             |

# Open question

19) Please provide any additional comment or suggestion that you consider relevant for the endocrine disruptors Fitness Check.

2000 character(s) maximum

REACH is far too slow and retrospective. How are new independent studies monitored and evaluated by ECHA?

# Please upload your file

The maximum file size is 1 MB
Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Thank you for your participation!

#### Contact

JRC-F3-ENQUIRIES@ec.europa.eu