

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

Fields marked with * are mandatory.

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 [Stakeholders Survey](#). 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
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- Maltese
- Polish
- Portuguese
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* 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

Elisabeth

* Surname

RUFFINENGO

* Email (this won't be published)

elisabeth.ruffinengo@wecf.eu

* Organisation name

255 character(s) maximum

Women Engage for a Common Future

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |

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- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
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- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Ethiopia
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- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
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- Hong Kong
- Hungary
- Iceland
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- Nauru
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- North Macedonia
- Norway
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
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- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey

- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
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- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
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- Laos
- Latvia
- Lebanon
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- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Turkmenistan
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- Ukraine
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- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

* 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 [personal data protection provisions](#)

Information on endocrine disruptors

1) How well informed are you about endocrine disruptors?

- Very well informed
- Reasonably well informed
- Poorly informed
- Not informed at all

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

consumer magazines and consumer products surveys

3) How well informed are you about the decisions made in the EU with regard to endocrine disruptors?

- Not at all, I trust regulators to make the right decisions to keep me safe
- Somewhat informed
- Very well informed
- Don't know

4) Do you think that the effects of endocrine disruptors on public health and the environment are understood?

- Yes
- Yes, to some extent
- No
- Don't know

Effectiveness of EU laws

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

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

Other

50 character(s) maximum

other fields are totally ignored

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 know
Unborn through exposure during pregnancy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Newborn up to the age of 3	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Children until puberty	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adolescents	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Pregnant women	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adults in general	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
People at work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Elderly	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
People with illnesses	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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 know
Insects, including bees and other pollinators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other invertebrates, such as snails, shrimps and worms	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fish and amphibians	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Birds and reptiles	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Mammals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Plants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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 know
Identifying endocrine disruptors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Managing the risks of exposure to endocrine disruptors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Endocrine disruptors are all identified	Endocrine disruptors are partially identified	Few are identified	None are identified	Don't know
Pesticides	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biocides	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Toys	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detergents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fertilisers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Electrical and electronic equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Furnishings (home /office)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Food contact materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Food additives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personal care products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Medical devices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Human and veterinary medicines	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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12) In your opinion, to which extent do EU laws **manage the risks** to endocrine disruptors in the following sectors?

	Well managed	Fairly well managed	Not well managed	Don't know
Pesticides	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Biocides	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Toys	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Detergents	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fertilisers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electrical and electronic equipment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Furnishings (home/office)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Food contact materials	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Food additives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Personal care products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Medical devices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Human and veterinary medicines	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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) of the EU laws on endocrine disruptors justified and proportionate for the benefits 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 at all	To a small extent only	To a moderate extent	Fully	Don't know
Costs for the agricultural sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs for the industry sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs for citizens	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ethical costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Not at all	To a small extent only	To a moderate extent	Fully	Don't know
Human health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Wildlife	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

17) In your opinion, who should regulate to protect people and wildlife from harm caused by endocrine disruptors? (multiple answers possible)

- 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 efforts are needed	The efforts are sufficient	Don't know
Identification of endocrine disruptors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coherent approach to identification and management of endocrine disruptors across regulatory sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing exposure of humans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing exposure of wildlife	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of burdens and costs to business	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Open question

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

2000 character(s) maximum

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