



EDC FREE EUROPE

LET'S STOP HORMONE DISRUPTORS

EDC-Free Europe comments on EU Commission Roadmap on a Chemicals Strategy for Sustainability

18 June 2020

General comments on context and purpose

EDC-Free Europe values the opportunity to comment on the EU Commission Roadmap on a Chemicals Strategy for Sustainability. We expect this strategy to deliver a comprehensive action plan on endocrine disrupting chemicals (EDCs), with immediate actions as well as mid-term and long-term measures to protect citizens and the environment from exposure to EDCs. The protective measures on EDCs, as defined by the 7th EAP in 2013, are long overdue.

The 2018 EC Communication "Towards a comprehensive European Union framework on endocrine disruptors" laid out some key principles and goals for the "EU strategic approach on EDCs", but it did not include a real action plan with specific measures, objectives timelines and budget to reach these objectives.

We see this Strategy, with its objective to "help to protect citizens and the environment better against hazardous chemicals", as a fundamental contribution to the EU Recovery Plan to equip Europe against future health threats, as well as to Europe's Beating Cancer Plan¹. For decades experts from the World Health Organization, scientists from the Endocrine Society and others have highlighted how EDCs are increasing our chances of getting serious, potentially lethal disease and health disorders. In recent publications they have described how EDCs impact our ability to fight against the novel coronavirus and the COVID-19 disease².

A report from leading scientists on endocrine science presented to the European Parliament in April 2019 stressed again that the EU population is widely exposed to known and suspected EDCs³, with annual costs related to exposure to EDCs estimated to be 163 billion Euros⁴. The Commission's own support study on

¹ <https://www.edc-free-europe.org/articles/european-developments/european-commission-launches-consultation-on-europe-beating-cancer-plan>

² L. Birnbaum & J. Heindel, Endocrine Disrupting Chemicals weaken us in our COVID-19 battle, Environmental Health News 23 April 2020
<https://www.ehn.org/chemical-exposure-coronavirus-2645785581.html?rebellitem=1#rebellitem1>

³ Burden of disease and costs of exposure to endocrine disrupting chemicals in the European Union: an updated analysis, L. Trasande et al. 2016
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5244983/>

⁴ Study Requested by the PETI committee, European Parliament, "Endocrine Disruptors: from Scientific Evidence to Human Health Protection", Barbara Demeneix, Remy Slama, March 2019

the Non-Toxic Environment⁵ highlights an annual €1.5 billion for female reproductive disorders and diseases in the EU as a result of exposure to EDCs.

These conclusions should temper the claims of the roadmap that the EU regulatory framework developed over the last 50 years “has successfully reduced risks to humans and the environment”. Conclusions of extensive EU Commission assessments of its chemical regulations undertaken over the last five years, including on EDCs, have clearly identified the gaps and inconsistencies of the EU regulatory framework on EDCs. The European Parliament Resolution of 15 April 2019⁶ calls for a wide range of improvements to be made, including legislative proposals to remove endocrine disruptors from cosmetics, toys and food packaging by June 2020.

Furthermore, results of a 2020 EU Commission stakeholder survey, undertaken as part of the EDC Fitness Check, indicate that two-third of respondents consider the level of protection from EDCs by EU regulations to be insufficient for different groups of the population. In particular, 66% of respondents say that protection to the unborn child and exposure during pregnancy is insufficient; a clear indication that citizens expect words to be turned into effective improvements of regulations and protection, to deliver a high level of health and environment protection without further delay. There can't be any justification to the current status quo of inadequate protection against exposure to EDCs.

Specific comments:

We support the objectives of the strategy which aim to deliver on the EU Commission commitment to a toxic-free environment and zero pollution ambition:

- To strengthen the regulatory framework on chemicals to “further increase the level of protection of human health and environment - in particular from exposure to endocrine disruptors, combinations of chemicals, hazardous chemicals in products including in imports, and very persistent chemicals - and to be able to rapidly react to emerging chemical risks and new scientific evidence”.
- To encourage innovation for the development of safe and sustainable alternatives.
- To address “insufficient enforcement and poor compliance” and ensure that existing legislation can attain its full potential.

We are concerned that the roadmap doesn't refer to:

- The pre-requisites for a non-toxic circular economy, which must be based on the goal to minimise toxic input from the onset.
- The issue of EDCs in exported products (double standards), waste and recycled products as well as the positions the EU is taking in multilateral initiatives for safer chemicals.⁷

⁵ <https://ec.europa.eu/environment/chemicals/non-toxic/pdf/NTE%20main%20report%20final.pdf>, 13.

⁶ https://www.europarl.europa.eu/doceo/document/TA-8-2019-0441_EN.html

⁷ See wide ranging exemptions to global ban of PFOA obtained by China, the EU, and Iran - May 2019 <https://chemicalwatch.com/77163/geneva-meeting-agrees-global-ban-on-pfoa-with-exemptions>, and very high levels for POPs in recycled plastics <https://english.arnika.org/press-releases/ipen-dioxins-found-in-toys-and-other-products>

The strategy should also include all other essential elements of an EU Endocrine Disrupting Chemicals Strategy, listed in EDC-Free Europe's "[Eight demands for an EU EDC Strategy](#)", in particular:

- An effective and coherent cross-sectorial system for the identification of EDCs, reflecting the level of scientific evidence available.
- A protective and coherent EDC management framework, in particular to minimise the use of EDCs in all types of consumer products.
- Provisions to protect us from exposure to chemical mixture including EDCs, to which we are all exposed to daily.
- An EU-list of known and suspected EDCs: a hazard category of "suspected EDCs" is coherent with current approaches to classify other chemicals, e.g. how cancer-causing chemicals are classified using categories 1A, 1B & 2.
- In the transition towards a robust and coherent system to deal with EDCs, it is urgent to protect the most vulnerable by making the most of available information in order to:
 - Prioritise rapid action to ban and restrict the use of already identified known and suspected EDCs;
 - Develop transparency on their use and awareness of supply chains and the public.

About the EDC-Free Europe coalition: EDC-Free Europe is a coalition of public interest groups representing more than 70 environmental, health, women's and consumer groups across Europe who share a concern about hormone disrupting chemicals (EDCs) and their impact on our health and wildlife. Campaign partners include trade unions, consumers, public health and healthcare professionals, advocates for cancer prevention, environmentalists and women's groups. The secretariat is hosted by the Health and Environment Alliance (HEAL). HEAL's [transparency Register number: 00723343929-96](#). Website: <http://www.edc-free-europe.org/>