

Brussels, 16 September 2021

To Commissioner Breton
To Commissioner Sinkevicius
To Commissioner Kyriakides

Subject: the EU must act swiftly and with ambition to end consumer's exposure to endocrine disrupting chemicals in cosmetics and personal care products.

Dear Commissioners,

Cosmetics ingredients with endocrine-disrupting properties represent a significant source of cumulative consumer exposure to endocrine disrupting chemicals (EDC).

On behalf of the EDC-Free Europe coalition, 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 and their impact on our health and wildlife, we are writing to urge you to take swift and ambitious action to protect the health of current and future generations by banning the use of these harmful chemicals in cosmetics and personal care products.

Following on the results of several recent studies and surveys that have been carried out by our members which expose the presence of EDCs and suspected EDCs in cosmetic and personal care products (see references to these studies in the annex), our coalition would like to **insist on the urgency to take comprehensive and ambitious measures to ban EDCs and suspected EDCs from consumer products, and in particular from cosmetics and personal care products.**

Consumers are in frequent, intimate and often prolonged contact with cosmetic and personal care products. International surveys suggest that on average women use between 12-16 personal care products per day^{1 2}. The time of puberty and use of cosmetics is also a matter of particular concern.

Results of biomonitoring studies further show that endocrine disrupting substances frequently used in personal care products and cosmetics are found in amniotic fluid³, the placenta⁴ and breast milk of mothers⁵⁶. We are alarmed by these correlations and deeply concerned about the exposure of pregnant women, children, and unborn child.

The European Chemicals Strategy for Sustainability (CSS) emphasizes that endocrine disrupting chemicals pose a serious risk to human health: "*As hormones control brain*

¹ https://www.beuc.eu/publications/beuc-x-2017-143_pmo_eo_complaint_edc_review_of_cosmetics_regulation.pdf

² <https://pubmed.ncbi.nlm.nih.gov/25680505/>

³ <https://www.uu.nl/en/news/amniotic-fluid-contains-numerous-unknown-chemicals-with-hormone-like-activity>

⁴ <https://pubmed.ncbi.nlm.nih.gov/29100749/>

⁵ <https://pubmed.ncbi.nlm.nih.gov/26773395/>

⁶ <https://pubmed.ncbi.nlm.nih.gov/28318231/>

development and growth, exposure to endocrine-disruptors during foetal development and puberty can lead to irreversible effects.” Taking into account the irreversible effects potential EDCs may have on vulnerable groups, we urge you to ensure that all potential EDCs are banned in cosmetics and personal care products without delay.

Against this backdrop, we welcome the commitments from the CSS to revise the EU Cosmetics Regulation to ensure that EDCs are banned in cosmetic and personal care products. We in particular wish to stress that:

- cosmetics ingredients with endocrine disrupting properties should be regulated consistently with substances of equivalent concern, such as those that cause cancer (*i.e.* CMRs). EU cosmetics rules prohibit use of known, presumed and suspected CMR substances, and a parallel approach is needed for substances with endocrine disrupting properties to achieve a high level of consumer protection.
- a more precautionary approach is needed to protect the health of consumers in situations where scientific evidence is currently insufficient, inconclusive or uncertain. Therefore, the precautionary principle needs to be enshrined in the legal text of the Cosmetics Regulation itself. With a stronger legal basis, supported by the best available scientific evidence, the precautionary principle would help guide risk managers in those circumstances where there are reasonable grounds for concern for consumer health, but evidence remains uncertain.

Furthermore, we urge you to ensure that use of the 28 known and suspected EDCs which the Commission has already identified for priority review is promptly restricted.

We would very much welcome the opportunity to meet with you to present the results of these studies in more details and exchange views on immediate steps for urgent protective measures until the legislation is improved.



Ms. Génon K. Jensen Spokesperson on behalf of the EDC-Free Europe Coalition,
Executive Director, Health and Environment Alliance (HEAL) HEAL

Transparency Register number: 00723343929-96



Bund für
Umwelt und
Naturschutz
Deutschland

Forbrugerrådet
Tænk

Danish Consumer Council



Annex: Examples of recent studies showing the presence of EDCs and suspected EDCs in personal care products

BUND reviewed the cosmetics ingredients lists of 60 000 cosmetics products on the German-speaking market and found that 30% included potential endocrine disrupting chemicals. <https://www.bund.net/service/publikationen/detail/publication/der-kosmetik-check/>

Tegengif - Erase all Toxins studied over a hundred popular personal care products in the Netherlands and found known and suspected endocrine disruptors in 60% of these products. <https://www.tegengif.nl/wp-content/uploads/2020/11/Tegengif-Onderzoeksrapport-2020-Niet-zo-mooi.pdf>. They teamed up with the **Health and Environment Alliance (HEAL)** to create a guide, *Under the Label: The story behind chemicals in cosmetics*, with a checklist of chemicals to avoid that consumers can take with them when shopping for cosmetics. https://www.env-health.org/wp-content/uploads/2021/07/UnderTheLabel_2pager-infographic_v4_final-1.pdf

The Danish Consumer Council has been studying endocrine disrupting chemicals in consumer articles such as toys, food contact materials and cosmetics for the past five years. Results of a recent study on deodorants revealed that out of 61 deodorant tested, 14 contain substances that researchers and authorities suspect of being endocrine disruptive <https://kemi.taenk.dk/bliv-groennere/test-these-chemicals-are-used-your-deodorant> .

The Danish Consumer Council has tested the ingredients in self-tanners, body lotion and lip balms. The test shows that 8 self-tanners contain substances that are suspected of being endocrine disruptors. <https://kemi.taenk.dk/bliv-groennere/test-chemicals-self-tanners> In the test for lip balms, several of them contain unwanted chemicals that are suspected to be endocrine disruptors. <https://kemi.taenk.dk/bliv-groennere/test-chemicals-lip-balms> The test for body lotions showed that several of them contained substances that are suspected to be endocrine disruptors. <https://kemi.taenk.dk/bliv-groennere/test-chemicals-body-lotion>

The mobile app Kemiluppen of the Danish Consumer Council shows that 35% of the cosmetic products registered contain one or more substances that are suspected of being endocrine disruptors. <https://kemi.taenk.dk/bliv-groennere/substances-new-list-endocrine-disruptors-are-widely-used-cosmetics>

Women Engage for a Common Future (WECF) studied the ingredients listed in 71 sun creams for children and found six ingredients which are EDCs of very high concern. <https://www.wecf.org/sunscreens-for-children-too-many-ingredients-of-concern/> (p.9) June 2020