

To: Members of the Environment Council of the EU and Permanent representations of EU Member States

Brussels, 13 December 2024

**Subject: 17 December Council of EU Ministers of Environment - Ensuring a more effective protection of health and the environment from endocrine-disrupting chemicals**

Dear Minister/ Permanent Representative,

As the Environment Council prepares to discuss critical EU legislative priorities, EDC-Free Europe - a coalition of over 70 public interest groups concerned about the impact of endocrine-disrupting chemicals (EDCs) on health and wildlife - calls on you to champion the protection of health and environment against adverse effects caused by EDCs. The expected revision of the REACH Regulation presents an opportunity to enhance protection for both human health and the environment. We call for your leadership in addressing the following issues:

### **1. Comprehensive and coherent control frameworks for EDCs**

EDCs are pervasive, posing a serious threat to public health and biodiversity. Their potential to lead to developmental, reproductive, and immune disorders is well-documented. Despite these risks, the current framework under REACH has been slow to identify and restrict EDCs. We call on you to **support the introduction of EDCs as a category of substances of very high concern (SVHC) under REACH** and automatically identify substances classified as EDCs under CLP Regulation as SVHCs under REACH. Additionally, the new hazard classes introduced in the CLP Regulation, including for endocrine disruption, should be integrated into the generic approach to risk management under REACH (Article 68.2). This integration in REACH would allow for a streamlined and efficient process to restrict EDCs once they are classified under the CLP, ensuring faster and more effective regulation.

### **2. Cocktail effect of chemical mixtures**

People and ecosystems are subjected to complex mixtures of chemicals, amplifying adverse effects. As foreseen in the Chemicals Strategy for Sustainability (CSS), **REACH must integrate a mixture**

**assessment factor (MAF) into chemical assessments** to address the combined exposure and to protect against the effects from co-exposure to chemical substances.

### 3. Information Requirements

Current data gaps continue to hinder robust decision-making. In line with the CSS, we urge you to champion the **revision of information requirements under REACH annexes to generate the data basis allowing for effective action on EDCs** and to be in line with the development and validation of new and more sensitive test methods for the identification of EDCs.

### 4. Access to justice and compensation for victims of chemical harm

The principle of accountability must underpin EU chemical regulation. Victims of chemical exposure and environmental harm face significant hurdles in accessing justice and securing compensation. **The legal framework should provide mechanisms to enable individuals and communities to demand actions such as injunctive relief and compensation from companies**, particularly in cases involving industrial chemicals. Ensuring effective access to justice aligns with fundamental EU values and will drive stronger compliance with regulatory obligations.

The upcoming discussions provide a pivotal opportunity to align EU chemical regulation with scientific evidence and public demand for stronger protection. Strengthening the legal framework to effectively address endocrine-disrupting chemicals, the cocktail effect, information transparency, and access to justice will not only safeguard the health of European citizens and the environment for generations to come, but also significantly reduce healthcare costs. By minimizing exposure to harmful chemicals, the burden of treating illnesses related to chemical pollution can be alleviated, leading to long-term economic and social benefits. For more details, we would like to refer you to our recent statement [\*“EDC-Free Europe: 7 priorities to protect people and environment from harm caused by endocrine-disrupting chemicals”\*](#).

We trust that you, as guardians of the European Union’s environmental agenda, will seize this moment to act decisively.

We would like to inform you that this letter will be made public.

Yours sincerely,

Ms. Génon K. Jensen, Spokesperson on behalf of the EDC-Free Europe Coalition,

Executive Director, Health and Environment Alliance (HEAL) HEAL

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