

The Consumer Voice in Europe

Ref.: BEUC-X-2017-101

Brussels, 3 October 2017

Re: Reject a narrow EU definition of endocrine disruptors

Dear Member of the European Parliament,

On Wednesday, 4 October, you will vote in plenary session on the European Commission's proposed identification criteria for endocrine disrupting properties.

Members of the European Parliament Environment committee last week objected to the Commission's proposed definition of endocrine disruptors. **BEUC shares the concerns deftly expressed in the endocrine disruptor objection.**

We therefore call on you in the interest of consumers to support this objection.

[Scientists](#), [Members of the EU Parliament](#), [Member States](#), [companies](#) and civil society organisations including [BEUC](#) have repeatedly criticised the Commission's approach as overly restrictive and consequently unfit to ensure adequate protection of human health and the environment. (Annexed to this letter, you will find BEUC's view on why an ambitious EU definition of endocrine disruptors matters to millions of consumers across Europe.)

Together, the European Parliament, Member States and the Commission have a huge responsibility to protect the health of current and future generations. We trust that you will put them first when making this important decision.

We remain of course available for any question you might have.

With kind regards,

Pelle Moos
Project officer on Chemicals and Trade

Encl.: Why an endocrine disruptor definition matters to consumers.

Annex – Why an endocrine disruptor definition matters to consumers

Endocrine disruptors are chemicals that disrupt the hormone system and are [linked](#) to severe human health problems, such as cancers, neuro-behavioural disorders or infertility.

Suspected endocrine disruptors are found in pesticides but also in many everyday consumer products, for example **cosmetics**, **food packaging** or **toys**. Evidence from six product tests undertaken by EU consumer organisations illustrates how exposure to suspected endocrine disruptors is a risk that concerns us all:

- * Five out of eight cans of peeled tomatoes [tested](#) by the Danish Consumer Council contained bisphenol A, a known endocrine disruptor.
- * UFC Que-Choisir, our French member, [found](#) known or suspected endocrine disruptors, such as ethylhexyl methoxycinnamate, in 7 out of 17 sunscreens.
- * DIBP, a phthalate which is toxic to reproduction, was found in two soft toys [tested](#) by German Stiftung Warentest.
- * 1 in 2 beauty balms [tested](#) by Altroconsumo in Italy contained either known or suspected endocrine disruptors, such as propylparaben or butylparaben.
- * PFOA, a chemical with known endocrine-disrupting properties, was found in three out of six children's jackets [tested](#) by the Norwegian Consumer Council.
- * The Danish Consumer Council [found](#) that in 4 out of 5 'loombands', a popular children's toy, concentrations of the phthalate DEHP exceeded legal limit values.

In all of these tests, chemicals with known or suspected endocrine disrupting properties were found in some but not in all tested products. Sadly, much of our exposure could be avoided as in many cases use of these chemicals do not seem necessary for the final product.

Several EU laws regulate EDCs *in theory*. But their practical implementation falls short as they lack concrete criteria that define what an 'endocrine disruptor' is. As a result, EDCs escape effective control under current EU laws despite the urgent need to minimise consumer exposure.

BEUC welcomes the European Parliament's close scrutiny of the proposed identification criteria for endocrine disrupting pesticides. **We share the concerns deftly expressed in the endocrine disruptor objection.**

Unless the proposed definition is modified, many chemicals which scientists believe could disrupt our hormone system will escape the regulatory net. To BEUC, an EU definition of endocrine disruptors needs to capture all chemicals that may disrupt the hormonal system; that is, both those chemicals we know are endocrine disruptors and those we suspect are endocrine disruptors. This will enable the EU to effectively protect consumers against these harmful chemicals.

In line with European Parliament [resolution](#) of 14 March 2013 on the protection of public health from endocrine disruptors, BEUC urges Members of the European Parliament to only adopt identification criteria that:

- ✓ require a reasonable burden of proof and respect the precautionary principle, namely that protective action should prevail in the face of scientific uncertainty;
- ✓ introduce multiple classification categories according to the available level of evidence, *i.e.* known, presumed and suspected endocrine disruptors. This is already the case for chemicals that cause cancer, change DNA or are toxic to reproduction;
- ✓ are applicable to all relevant laws protecting EU citizens and the environment ranging from pesticides to cosmetics and toys.

END