

Ref.: BEUC-L-2016-216/SMA/PMO/cm

16 June 2016

**RE: The European Commission's proposal for scientific criteria to identify endocrine disruptors**

Dear Attaché,

On 20 June, the European Commission will inform the Environment Council about its proposal for criteria to identify endocrine disruptors (ED) in the field of plant protection products and biocides. On behalf of BEUC, the European Consumer Organisation, we write to express our deep concern about the criteria presented by the Commission on 15 June.

An EU definition of endocrine disruptors needs to identify *all* chemicals that may disrupt the hormonal system, *i.e.* it needs to distinguish among *known*, *presumed* and *suspected* endocrine disruptors based on the level of scientific evidence. This will enable the EU to effectively protect consumers against these harmful chemicals.

Regrettably, the definition announced by the Commission identifies only *known* endocrine disruptors. The narrow scope of this definition will result in few endocrine disruptors being identified and regulated, even when there is compelling scientific evidence of harm. It will therefore fail to adequately protect consumers.

Specifically, the Commission's proposal is fundamentally flawed, because

- **The criteria demand an onerous level of proof** for a substance to be defined as an endocrine disruptor. As a result, only a few substances will be defined and regulated. This approach contradicts the precautionary principle where protective action should prevail even in the face of scientific uncertainty.
- **EU laws require identification of presumed *and* suspected endocrine disruptors.** For example, EU pesticides laws and REACH address chemicals with ED properties that *may cause* adverse effects or for which scientific evidence of *probable serious effects* to human health or the environment exists.
- **It ignores the advice of international scientists** that scientific criteria needs to identify known, presumed and suspected endocrine disruptors.<sup>1</sup>
- **The criteria are inconsistent with how the EU classifies chemicals of equal concern**, such as carcinogens, mutagens and reprotoxins (CMRs).

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<sup>1</sup> Rémy Slama *et al.*, Scientific Issues relevant to Setting Regulatory Criteria to Identify Endocrine Disrupting Substances in the European Union, *Environmental Health Perspectives*, 25 April 2016.

We call on your delegation, at the upcoming Environment Council, to urge the European Commission to abandon its flawed proposal and instead urgently adopt the draft 2013 criteria presented to the working group on endocrine disruptors.<sup>2</sup>

Best regards,

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Head of Sustainability and Safety

Pelle Moos  
Project Officer on Chemicals and Trade

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<sup>2</sup> [http://www.environmentalhealthnews.org/ehs/news/2013/pdf-links/2013.06.11%20EDC\\_Recommendation%20Commission%20Draft.pdf](http://www.environmentalhealthnews.org/ehs/news/2013/pdf-links/2013.06.11%20EDC_Recommendation%20Commission%20Draft.pdf)