

## Feedback on the Draft Regulation on „Criteria to identify endocrine disruptors for plant protection products“

Umweltinstitut München e. V. calls on the EU Commission to make significant changes to the proposed criteria for identifying endocrine disrupting chemicals (EDCs). The current proposal fails to address this pressing public health threat and fulfil the legal mandate to protect the health of humans, animals and the environment from exposure to these chemicals in our daily lives. The proposed criteria requires such a high amount of evidence that it will be nearly impossible to identify more than a small number of substances posing a threat to human health & environment from hormone disruption. In contrast, current lists of potential EDCs include over 800 substances.

Over 1300 scientific studies link exposure to EDCs to spiralling rates of hormone-related cancers such as breast or testicular cancer, fertility problems, diabetes, obesity & behavioural problems in children. The World Health Organization has called EDCs a ‘global threat’. The health costs of diseases associated with EDC exposure are estimated at 158 billion € yearly in the EU.

The Commission has ignored the majority of respondents to its 2015 public consultation who supported the most effective use of science to protect humans and wildlife, especially vulnerable groups such as pregnant women, babies and children. In the 7<sup>th</sup> Environmental Action program, the EU committed to minimising EDCs exposure. To achieve this goal, 2 major aspects need to be changed:

- 1) The Commission proposes to identify EDCs only if they are **known** to have adverse effects in humans or wildlife not intended to be affected. The word ‘known’ means to have proof. Demanding such proof weakens the current law which says to regulate those substances that ‘may’ cause harm (like for carcinogens that ‘may cause cancer’). Such a high burden of proof blocks expert opinion about the likelihood of an effect and is unacceptable, as it is likely to result in damage to humans and the environment before action is taken.  
This contradicts the precautionary approach enshrined in the EU Treaty and built into the biocide & pesticides laws. It also clashes with the current successful approach of identifying & ranking carcinogens and chemicals toxic to reproduction. Substances should be identified as EDCs when they are known **or presumed** to have adverse effects. The Commission should act on the existing scientific knowledge and the best option for health is an approach with 3 categories according to the level of evidence.
- 2) The Commission proposes widening the current exemption for those pesticides identified as EDCs into a major loophole. Changing ‘negligible exposure’ to ‘negligible risk’ would allow continued uncontrolled exposure to these EDCs. This is unacceptable. The Commission has gone beyond their

identification task, weakening the law by reintroducing specific risk assessments for pesticides identified as EDCs in the future

The proposal must be rectified to ensure a high level of protection for health and the environment, preventing endocrine-related diseases for Europeans and averting damage from our ecosystems. France, Sweden and Denmark have already expressed their disagreement <http://goo.gl/oU3QDS>. The world's leading experts on EDCs - the Endocrine Society <https://goo.gl/MNE4c7> and other scientists <http://goo.gl/u0LtlI> have strongly criticised the proposal, as have certain industry sectors who believe the criteria should be stronger to identify and phase out potentially harmful materials <http://goo.gl/pmYHkh>.

EDCs are a threat to our society's current & future public health and prosperity. Europe should take a leading role in regulating EDCs, as this will stimulate innovation so that all industries in the various sectors develop and use better and safer alternatives. Our everyday exposure to these chemicals – in our food, cosmetics, homes, countryside, work places, schools, & hospitals, must stop to protect the health of current and future generations.

## **Feedback on the Draft Regulation on „Criteria to identify endocrine disruptors for biocidal products“**

Umweltinstitut München e. V. calls on the EU Commission to make significant changes to the proposed criteria for identifying endocrine disrupting chemicals (EDCs). The current proposal fails to address this pressing public health threat and fulfil the legal mandate to protect the health of humans, animals and the environment from exposure to these chemicals in our daily lives. The proposed criteria require such a high amount of evidence that it will be nearly impossible to identify more than a small number of substances posing a threat to human health & environment from hormone disruption. In contrast, current lists of potential EDCs include over 800 substances.

Over 1300 scientific studies link exposure to EDCs to spiralling rates of hormone-related cancers such as breast or testicular cancer, fertility problems, diabetes, obesity & behavioural problems in children. The World Health Organization has called EDCs a 'global threat'. The health costs of diseases associated with EDC exposure are estimated at 158 billion € yearly in the EU.

The Commission has ignored the majority of respondents to its 2015 public consultation who supported the most effective use of science to protect humans and wildlife, especially vulnerable groups such as pregnant women, babies and children. In the 7<sup>th</sup> Environmental Action program, the EU committed to minimising EDCs exposure. To achieve this goal, the following major aspect needs to be changed:

The Commission proposes to identify EDCs only if they are **known** to have adverse effects in humans or wildlife not intended to be affected. The word 'known' means to have proof. Demanding such proof weakens the current law which says to regulate those substances that 'may' cause harm (like for carcinogens that 'may cause cancer'). Such a high burden of proof blocks expert opinion about the likelihood of an effect and is unacceptable, as it is likely to result in damage to humans and the environment before action is taken.

This contradicts the precautionary approach enshrined in the EU Treaty and built into the biocide & pesticides laws. It also clashes with the current successful approach of identifying & ranking carcinogens and chemicals toxic to reproduction according to the level of evidence. Substances should be identified as EDCs when they are known **or presumed** to have adverse effects. Only this approach is consistent and coherent with the EU biocides law which says biocides should not be allowed on the market if they "are considered as having endocrine-disrupting properties **that may cause** adverse effects in humans". The Commission should act on the existing scientific evidence and the best option for health is an approach with 3 categories (confirmed; suspected and potential EDC).

The proposal must be rectified to ensure a high level of protection for health and the environment, preventing endocrine-related diseases for Europeans and averting damage from our ecosystems. France, Sweden and Denmark have already expressed their disagreement <http://goo.gl/oU3QDS>. The world's leading experts on EDCs - the Endocrine Society <https://goo.gl/MNE4c7> and other scientists <http://goo.gl/u0LtlI> have strongly criticised the proposal, as have certain industry sectors who believe the criteria should be stronger to identify and phase out potentially harmful materials <http://goo.gl/pmYHkh>.

EDCs are a threat to our society's current & future public health and prosperity. Europe should take a leading role in regulating EDCs, as this will stimulate innovation so that all industries in the various sectors develop and use better and safer alternatives. Our everyday exposure to these chemicals – in our food, cosmetics, homes, countryside, work places, schools, & hospitals, must stop to protect the health of current and future generations.