President José Manuel Barroso
Cc: **Vice-President Antonio Tajani, EU Commissioner for Industry and Entrepreneurship**
Cc: **Commissioner Janez Potočnik, EU Commissioner for Environment**
Cc: **Commissioner Tonio Borg, EU Commissioner for Health and Consumer Policy**

Brussels, 7 May 2013

Dear President Barroso,
Dear Commissioners Tajani, Potočnik, and Borg,

We, the undersigned environmental, occupation/workers, and health organisations are writing to express our concerns about a matter of urgency for the health of EU citizens and wildlife. You will soon be taking key decisions on Endocrine Disrupting Chemicals (EDCs), which the World Health Organisation (WHO) and United Nations Environment Programme (UNEP) have called a global threat that needs to be resolved.

Your decisions could set the path for significantly reducing exposure to these hazardous chemicals, reducing European national economies' spending on endocrine related diseases, promoting green chemistry and safer products in the EU, and ensuring EU leadership in global chemicals management.

With the Europe 2020 strategy, the EU has set itself the goal of becoming a smart, sustainable and inclusive economy. We believe that acting on EDCs will make a significant contribution to greater sustainability and lead to a more efficient use of resources through the development of better, safer, and greener chemicals, and ultimately strengthen the competitiveness of Europe's chemical industry. In addition, economic recovery starts with a healthy population. Reducing exposure to EDCs will bring significant health benefits in the short and long term.

The weight of scientific evidence, as outlined in the recent review by the WHO and UNEP, tells us that EDCs are linked to serious irreversible impacts on human health and wildlife. Recent EU co-funded human biomonitoring shows certain EDCs are found in both children and their mothers. It is therefore important that the EU ensures that European health and environmental protection is not undermined by policies which disproportionately address the interests of companies producing hazardous chemicals. Exposure reduction should form the key goal of EU EDC policy.

In particular we call on the EU Commission to adopt in the coming weeks:

1) Comprehensive and workable criteria to identify EDCs
   Getting the criteria right for identifying EDCs is the first crucial step in achieving adequate regulation of chemicals with endocrine disrupting properties.
2) A robust and far-sighted EU EDCs Strategy
   Our organisations have already provided proposals for the revision of the EU EDC Strategy[1]. Today, we would like to highlight one point of particular importance: The EU must develop and implement a screening and testing strategy that addresses the complexity of the endocrine system, to correctly identify which chemicals are EDCs. The existing testing requirements in the legislation are not able to do this currently.
3) Review of EDCs in REACH authorisation, based on the latest science
   The upcoming review on how EDCs are regulated under the REACH authorization procedure provides an important opportunity to promote the replacement of EDCs with safer alternatives. The review should ensure that an authorization for an EDC - as for Persistent, Bioaccumulative and Toxic chemicals - can only be granted if no safer alternatives are available and the use is essential to society.

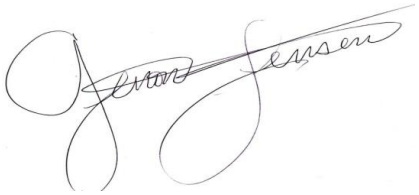
Further details on these three issues are set out in the Annex.

We call on you to recognise the overwhelming evidence of the dangers of EDCs and acknowledge the conclusion from the EU Commission's EDC conference in June 2012 and echoed in the WHO/UNEP report: a tipping point has been reached. Now you must take the necessary steps to reflect this knowledge in EU Chemicals Policy.

We also call on you to ensure European leadership in the global context as EDCs have become a priority issue in international negotiations on chemical management. Recent reports from the European Environmental Agency (EEA) and UNEP have demonstrated the costs of inaction associated with health and environmental effects of chemicals exposure and how much more expensive it is to take action later after there have been early warnings.

In view of the public interest in this matter, we intend to make the contents of this letter more widely available.

Sincerely,



Genon K. Jensen,
Executive Director, Health and Environment Alliance (HEAL)

[1] The Swedish Society for Nature Conservation was not a signatory to our joint submissions on the EDC strategy.

Supported by the following organisations:
European Environmental Bureau (EEB)
Greenpeace European Unit
Pesticide Action Network Europe (PAN - E)
Client Earth
Health Care without Harm (HCWH)
Women in Europe for a Common Future (WECF)
Alliance for Cancer Prevention (ACP)
Breast Cancer UK
BUND Friends of the Earth Germany
Cancer Prevention and Education Society (CPES)
Center for International Environmental Law (CIEL)
Chem Sec
CHEMTrust
Danish Ecological Council
Ecologistas en Acción
Fundación Vivosano
Générations Futures
Réseau Environnement Santé (RES)
Swedish Society for Nature Conservation

Annex

1) EDC Criteria
   Getting the criteria right for identifying EDCs is the first crucial step in achieving adequate regulation of chemicals with endocrine disrupting properties.

   - Any criteria that the Commission proposes for identifying 'chemicals with ED properties' must not undermine the requirements of existing EU laws. Therefore EDCs must be controlled regardless of how strong they are – i.e. no "potency cut-offs".
   - The criteria should ensure transparency of existing data and provide incentives for more data generation. The currently deleted category 3 should be re-introduced into the final Commission's proposal for the criteria. A category 3 is vital to provide transparency on what findings already exist, and to encourage manufacturers to provide further data. Not to include a category 3 in the criteria would be a step backward from the previous EU categorisation scheme for EDCs, which had a category based on *in-vitro* data.
   - In addition, the criteria must not demand too high a burden of proof for showing how the chemicals exert their effects. Outstanding scientific questions should not lead to inaction. The criteria must be applied in individual pieces of EU legislation (e.g. pesticides, biocides) so that chemicals highly suspected to be EDCs are regulated.

2) EU EDC Strategy
   Our organisations have already provided proposals for the revision of the EU EDC Strategy[2]. Today, we would like to highlight one point of particular importance: The EU must develop and implement a screening and testing strategy that addresses the complexity of the endocrine system, to correctly identify which chemicals are EDCs. The existing testing requirements in the legislation are not able to do this currently.

   Furthermore, the structural barrier to identifying EDCs under the animal testing ban of the cosmetics law must be addressed. To date regulators use animal test data to categorise chemicals. Now, given the animal testing ban in the cosmetics law, the Commission must enable and support regulators to categorize chemicals based on information from non-animal test methods. Otherwise the important aim of minimising animal testing will leave the public unprotected, because no cosmetic ingredient will be identified as an EDC in the absence of animal data.

3) Review of EDCs in REACH authorisation
   The upcoming review on how EDCs are regulated under the REACH authorization procedure provides an important opportunity to promote the replacement of EDCs with safer alternatives. The REACH Candidate list is encouraging innovation and substitution of hazardous chemicals with safer chemicals, according to a recent EU Commission

[2] The Swedish Society for Nature Conservation was not a signatory to our joint submissions on the EDC strategy.

report. However, if authorizations are given for ‘adequate control’, it will undermine efforts in the transition to safer chemicals. The general population is exposed continuously to a cocktail of EDCs and there is no scientific evidence that “safe exposure levels” can be identified with sufficient certainty. Therefore, the review should ensure that an authorization for an EDC - as for Persistent, Bioaccumulative and toxic chemicals - can only be granted if no safer alternatives are available and the use is essential to society.