



**CHEMTrust**

Protecting humans and wildlife  
from harmful chemicals

# Consultation Response July 2018

## Response to Commission Roadmap `Towards a more comprehensive framework on endocrine disruptors'<sup>1</sup>

### General comments

CHEM Trust welcomes the Commission roadmap as a long-overdue response to the current insufficient patchwork of regulation of endocrine disrupting chemicals (EDCs) in the EU. After the adoption of the EDC criteria under the EU biocides and pesticides laws, it remains to be seen how effectively they will be put in place.<sup>2</sup> We therefore urge the Commission to take this opportunity to adopt an updated EU wide Community Strategy with specific measures to close current gaps in identifying and controlling EDCs across all relevant EU policies. Only then can a high level of protection for health and environment be achieved.

CHEM Trust is worried that the roadmap appears rather backwards-looking. A communication exercise to summarise the state of play in the EU would surely miss the point. Citizens are neither concerned because of the complexity nor the uncertainties, but because scientific research over many years has revealed increasing evidence that EDC exposure can adversely affect wildlife (as was already known over 20 years ago)<sup>3</sup> and can contribute to several serious human diseases and disorders.<sup>4,5</sup>

### Specific comments

In CHEM Trust's view EDCs should be treated as non-threshold substances equivalent to chemicals with PBT/vPvB properties. This is due to increased uncertainties in the risk assessment and the potential to lead to serious and irreversible effects in current and future generations (see CHEM Trust briefings).<sup>6,7</sup>

<sup>1</sup> [https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-3295383\\_en](https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-3295383_en)

<sup>2</sup> <http://www.chemtrust.org/edc-guidance/>

<sup>3</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2721670/>

<sup>4</sup> CHEM Trust report: No Brainer: The impact of chemicals on children's brain development: a cause for concern and a need for action, March 2017, <http://www.chemtrust.org/brain/>

<sup>5</sup> Gore AC, Chappell VA, Fenton SE, Flaws JA, Nadal A, Prins GS, et al. 2015. EDC-2: The Endocrine Society's Second Scientific Statement on Endocrine-Disrupting Chemicals. *Endocr. Rev.* 36:E1–E150; doi:10.1210/er.2015-1010

<sup>6</sup> <http://www.chemtrust.org/wp-content/uploads/CHEM-Trust-Briefing-on-REACH-EDC-review-FINAL.pdf>

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CHEM Trust recommends that the Commission consider the 8 essential elements for a new European EDC Strategy, which were presented jointly by the EDC Free Europe coalition that CHEM Trust is a member of.<sup>8</sup>

This means the following 3 approaches should form the central part of the new EDC strategy. The new EDC Strategy should:

- 1) ... establish measures with timelines for achieving the target of the 7th Environment Action programme to minimise exposures to EDCs by 2018.<sup>9</sup> Activities should e.g. include the publication of a list of currently known and suspected EDCs as well as an increased focus on regulating groups of chemicals.<sup>10</sup> Moreover, it needs to lay out a plan for closing current policy gaps, such as in the lack of effective regulation of EDCs in food contact materials. In a recent letter to the Commission we highlighted that fact that the proposed REACH restriction on 4 phthalates does not cover food contact materials although this is a significant exposure source.<sup>11</sup> This is one example of the need for better coherence in EU regulations in order to avoid these gaps in risk management.
- 2) ... have a specific focus on actions to address the problem of combination effects of exposure to mixtures of EDCs from various sources. The Roadmap acknowledges that mixtures may have adverse effects at concentrations at which individually no effect has been observed; this has now been demonstrated numerous times by researchers. This means that the current single-substances based risk assessment is not protective and a new approach is needed.
- 3) ... adopt a clear plan for speeding up the identification of EDCs in the various legislations. This will include updating test requirements with new screens and tests with sensitive endpoints and is necessary to take account of scientific developments and new insights gathered in the context of EU research projects and other Commission activities.<sup>12</sup>

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<sup>7</sup> <http://www.chemtrust.org/wp-content/uploads/Hazard-v-Risk-a-CHEM-Trust-position-paper-Nov-2013.pdf>

<sup>8</sup> <http://www.edc-free-europe.org/wp-content/uploads/2018/05/EDC-Free-statement-on-EU-EDC-Strategy-final-EN1.pdf>

<sup>9</sup> <http://ec.europa.eu/environment/action-programme/>

<sup>10</sup> CHEM Trust report: From BPA to BPZ: a toxic soup? How companies switch from a known hazardous chemical to one with similar properties, and how regulators could stop them”, March 2017, <http://www.chemtrust.org/toxicsoup/>

<sup>11</sup> <http://www.chemtrust.org/policy-statements/>

<sup>12</sup> <https://publications.europa.eu/en/publication-detail/-/publication/6b464845-4833-11e8-be1d-01aa75ed71a1/language-en>