



CHEMTrust

Protecting humans and wildlife
from harmful chemicals

Mr P Woolas MP
Minister of State Environment
Department for Environment, Food & Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

29th May 2008

Dear Minister

CANDIDATE LIST OF CHEMICALS UNDER THE EU CHEMICALS REGULATION (REACH)

Around one in nine women in the UK are confronted with breast cancer, and the number of women with breast cancer has dramatically increased throughout Europe over the past 20 years. Commissioned by CHEM Trust, Prof. Andreas Kortenkamp of the London School of Pharmacy has written the following report; ***Breast cancer and the exposure to hormonally active chemicals: an appraisal of the scientific evidence.*** A copy of the report is enclosed and further copies are available from the CHEM Trust website at the following link;

http://www.chemtrust.org.uk/index.php?option=com_content&task=view&id=60&Itemid=69.

This study convincingly outlines that the number of women diagnosed with breast cancer cannot be reduced without reducing women's exposure to chemicals that disrupt hormones and mimic oestrogen.

In this regard, CHEM Trust strongly believes that reducing the prevalence of these hormone-disrupting chemicals should be a top priority in the implementation of REACH (the EU Regulation for the Evaluation, Authorisation and Restriction of Chemicals).

To this end, we would like to make three specific recommendations:

1. That the UK Competent Authority includes hormone-disrupting chemicals on the candidate list for authorisation due in autumn 2008 (article 59);

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2. That the UK Competent Authority recommends at least one known hormone-disrupting chemical is included on the first priority list of substances to be subject to the authorisation procedure, which is due by June 2009 and is based on the candidate list (article 58, 3-4);
3. That the UK Competent Authority ensures as many as possible of the chemicals meeting the criteria for substances of very high concern under REACH are put onto the candidate list as soon as possible. We note that chemicals already classified as carcinogens, mutagens or reproductive toxicants (CMRs category 1 and 2) can be put on to the candidate list relatively easily.

With respect to bullet points 1 and 2, we recommend that the UK Competent Authority drafts an Annex XV dossier for Bisphenol A (BPA) to put this chemical on the candidate list, and thereafter on the priority list. We would urge the UK Government to adopt this strong leadership position within the EU for the following reasons; BPA is a known oestrogenic substance; new research indicates BPA has the ability to alter the activity of genes in normal breast cells in ways that resemble what is found in extremely dangerous breast cancers, and finally; Canada's Health and Environment Ministers' joint actions to give advance warning of their intent to ban BPA from key consumer products.

CHEM Trust is convinced these measures are necessary to tackle the breast cancer epidemic. Such measures would be likely have a significant beneficial impact on public health generally, particularly in reducing adverse effects on male reproductive health, including testicular cancer.

In order to underline the consensus of scientific opinion concerning the need to reduce exposure to chemicals with hormone disrupting properties, the 2005 Prague Declaration, signed by over 200 scientists, including leading researchers from across the EU, many of whom have been involved in EU funded research projects on endocrine disruptors stated;

“For the foreseeable future, regulation of endocrine disruptors will have to cope with the tension between the biological plausibility of serious, perhaps irreversible damage and delays in generating data suitable for comprehensive risk assessment. In view of the magnitude of the potential risks, we strongly believe that scientific uncertainty should not delay precautionary action for risk reduction.”

During the negotiations, the UK played an important role in initially putting forward the concept of a candidate list for REACH. With the political will to make this a comprehensive list, CHEM Trust believes the candidate list will be a very useful mechanism to steer industry away from the use of these substances in advance of them actually coming under the stricter controls that the authorisation procedure itself would trigger. Giving industry longer lead times to find safer alternatives, will also serve to reduce their costs.

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Chemicals which are classified as CMR category 1 and 2 (carcinogens, mutagens and reproductive toxicants) can be drawn onto the candidate list relatively easily, because for these substances the Annex XV dossier may be limited to a reference to an entry in Annex I of Directive 67/548 (Article 59(2)). However, we feel it is also vital that the Annex XV dossiers of CMR substances which are additionally known to have hormone disrupting properties, should make reference to such properties and the studies which provide evidence for this. Such action would highlight the additional concerns relating to specific compounds and would also allow this information to be taken into account when deciding which route these chemicals should take to authorisation.

I hope you will take a close look at this urgent matter and I look forward to your reply.

Yours faithfully

Elizabeth Salter Green
Director

CC: 1. Lord McKenzie
Minister
Department for Work and Pensions

2. Dr Steve Fairhurst
UK Competent Authority
HSE