CHEM Trust comments on ED IDENTIFICATION guidance document

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• Involved in ED criteria debate since the beginning
• JRC Advisory group on ED criteria (2012-2013)
• ECHA ED expert group
• OECD ED expert group
3 major concerns

1. Role of **mode of action analysis** in the identification

2. Due consideration of **multiple modes of endocrine action**

3. Sufficient **data to conclude?**
1. Mode of action analysis

- Proposed approach too burdensome and unrealistic
- Not required by legislation and adopted ED criteria
- Finding out detailed mechanism can take decades (e.g. TBT)

➢ Need for a ‘short-cut’ MoA to describe the plausible link
2. Multiple modes of action

- Is it really feasible to investigate each ED mode of action in isolation?

- Many EDs acting on multiple modes of action which need to be allowed to be assessed together instead of detailed MoA

  - Crucial for ED identification are the effects on hormone sensitive tissues, irrespective if 1 or several MoAs
3. Sufficient data to conclude?

- Ambiguity: data from old version of test guidelines not sufficient to rule out ED properties

- Will updated EORGTS always be required?
  - Need to have clear follow-up action on inconclusive cases
Why is this so important?

EFSA, 2013: 
´101 out of 287 screened pesticides affecting thyroid system´
Conclusions

1. Mode of action analysis should not be required (paralysis by analysis)

2. Multiple modes of action need to be allowed to be assessed together

3. Clear procedure needed for following up on inconclusive and potential EDs