



CHEMTrust

Protecting humans and wildlife
from harmful chemicals

Comments on Draft Report

CHEM Trust's comments on the draft report, commissioned by UNEP, entitled "*Compilation of Lists of Chemicals Recognised as Endocrine Disrupting Chemicals (EDCs) or Suggested as Potential EDCs*"

September 2016

Introduction

CHEM Trust welcomes the opportunity to comment on this important document.

CHEM Trust is a UK registered charity that works at European, UK and International levels to prevent man-made chemicals from causing long term damage to wildlife or humans, by ensuring that chemicals which cause such harm are substituted with safer alternatives. We particularly focus on endocrine disrupting chemicals (EDCs), with several of our team having first started work on EDCs more than 20 years ago.

Our long experience of this field informs our comments below, including our disappointment with the continuing negative response from the chemical industry.

General comments on the draft report

We support the draft report as an important action in the implementation of the joint UNEP-WHO-OECD work plan on EDCs, as requested by more than 140 States at the last International Conference on Chemicals Management (ICCM4).

We find the report accurate and well-referenced, and a good starting point. It provides important guidance to governments, scientists and producers and downstream users of chemicals. However, the current list still misses important EDCs and should be expanded (see specific comments below).

It is important to note that research on EDCs continues to evolve, particularly given the fact that most chemicals have not been tested for EDC properties. This list should therefore continue to be updated over time.

Particular comments on the lists used

- There are chemicals identified as REACH SVHCs for reason of reproductive toxicity which have endocrine modes of action, even though this has not been

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identified as the reason they are on the list. This includes some phthalates, for example. The report needs to address this in a more comprehensive way.

- The EU's REACH Authorisation system focusses on industrial chemicals, excluding pesticides, biocides, cosmetics and human health aspects of chemicals in food contact materials. This means that it is an incomplete list of SVHC substances in use.
- The SIN list is a transparent and rigorous list that should be used as a source in this report. However, it is limited in its scope as it is focussed on chemicals that could be identified as SVHCs within REACH¹.
- The Danish list of EDCs is currently being updated and should be included in this report as soon as it becomes available².
- Given the importance of including pesticides in this list of EDCs, we would propose the inclusion of relevant pesticides that are mentioned in the UNEP/WHO "State of the Science of Endocrine Disrupting Chemicals" report (such as 2,4-D, Atrazine, Carbaryl, Malathion, Mancozeb, Vinclozolin, Prochloraz, Procymidone, Chlorpyrifos, Fenitrothion, and Linuron), as well as of the Stockholm Convention substances (known or potential EDCs in Table 3.1, UNEP/WHO report), that are absent from the current draft.

The response from the chemical industry

CHEM Trust is disappointing to read that the International Council of Chemical Associations is calling for this list to be withdrawn³, in spite of the fact that this is a well sourced scientific analysis.

Unfortunately we are not surprised by this response, as we have found that the main response of much of the chemical industry to the endocrine disruption issue has been to avoid properly acknowledging the issue. Instead they have too often focussed on deferring action, in a way reminiscent of the debate on climate change.

In conclusion

This important report is based on solid, sound, science and should be published, and refined and updated regularly in the form of an official UNEP/WHO list.

The report will be useful around the world, from the EU to developing countries and countries with economies in transition, as requested by their governments in the process of the Strategic Approach to International Chemicals Management (SAICM).

¹ <http://chemsec.org/business-tool/sin-list/about-the-sin-list/sin-list-faq/>

² "Danish EDC list to be updated", Food Packaging Forum, 12th September 2016

<http://www.foodpackagingforum.org/news/danish-edc-list-to-be-updated>

³ <https://chemicalwatch.com/49295/icca-urges-unep-to-withdraw-endocrine-disruptor-list>