



Sent by email

Brussels, 29th June 2016

Dear Minister,

Subject: EU Health Commissioner chooses to protect the industry profit rather than the Health of Europeans and the environment

The Health Directory for the European Commission has failed to fulfil its duty to produce scientific criteria for endocrine disrupting chemicals (EDCs) that will protect the health of humans, animals and the environment from exposure to these chemicals.

On the 15th of June, 2,5 years after its deadline, Health Commissioner Andriukaitis finally announced the selected EDC criteria together with significant changes in the legislation¹. To our deep disappointment, the Commission not only proposed criteria with unreasonably high burden of proof that will take years of testing to prove a chemical is an EDC, but now with the new text, even when an EDC is identified it won't get banned from use in agriculture if the "risk" is negligible. Farmers, residents, the environment and consumers will still be exposed to these non-threshold chemicals.

Scientists from around the world, including the World Health Organisation and the Endocrine Society, have been warning us for years that low environmental levels of EDCs can alter our hormonal system and lead to serious health effects². If exposure takes place during the early-life stages, EDCs may cause endocrine-related diseases such as sex organ deformities, reproduction toxicity, infertility, obesity, behavioural changes, neurodegenerative and cognitive disorders. The health costs of diseases due to EDC exposure have already cost European citizens billions of Euros³.

Some of the most documented cases of endocrine disruption in wildlife and recently in humans have been due to exposure to pesticides or biocides. Pesticides in particular are of high concern since they are applied on an open field and also end up as residues in our food. For this reason, the European Parliament, the European Council and the European Commission mutually agreed in 2008 the Pesticide (Plant Protection Products 1107/2009) and Biocide Products (528/2012) Regulations to be "hazard-based" and "**ensure a high level of protection of both human and animal health and the environment**" (PPPR Art. 1(3)). Thus, EDCs along with chemicals that are mutagenic, carcinogenic or toxic to reproduction are recognised as hazards and must be forbidden from pesticide and biocide products.

¹ http://ec.europa.eu/health/endocrine_disruptors/policy/index_en.htm

² For a summary refer to: Opinions from the Scientific Community - PAN Europe
<http://www.pan-europe.info/resources/reports/2016/06/opinions-scientific-community>

³ <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4399291/>

But in plain disregard of the Regulation, and by exceeding its legal power, the Commission modified the regulatory text, and succeeded in changing the hazard-based Regulation to a risk-based one.

This is undoubtedly a result of the extreme lobbying from the industry, the trade sector and industrial farming and the production of scaremongering reports of how Europe will go hungry and will be left out of international trade (PAN Europe Impact Assessment Report Chapter 3)⁴. Clearly, the industry and trade sector have achieved their objective: the Health Commissioner, instead of protecting the human health and the environment, is now giving priority to the international market and private profit.

Member States have been asked to give their feedback on the criteria by the 7th of July. With this letter we hope for your reaction and call for:

- More time; it is crucial to select the correct set of criteria that will succeed to protect the health of humans, animals and environment from EDCs
- Removal of negligible “risk” from the text
- A wider definition of EDCs which will capture most such chemicals (equal to option 3 of the roadmap⁵ or draft criteria of 2013⁶)
- Start testing all pesticides immediately for endocrine disrupting properties

This is an issue of public concern, which needs an immediate reaction for the sake of our children, the environment and our future generations.

Kind regards,

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On behalf of PAN Europe

On behalf of ENSSER

⁴ Impact assessment of the criteria for endocrine disrupting pesticides
<http://www.pan-europe.info/sites/pan-europe.info/files/public/resources/reports/pan-report-impact-endocrine-criteria-2016.pdf>

⁵ PAN Europe’s position on roadmap <http://www.pan-europe.info/sites/pan-europe.info/files/public/resources/briefings/2014-position-edcs-roadmap.pdf>

⁶ [http://www.environmentalhealthnews.org/ehs/news/2013/pdf-links/2013.06.11
EDC_Recommendation_Commission_Draft.pdf](http://www.environmentalhealthnews.org/ehs/news/2013/pdf-links/2013.06.11_EDC_Recommendation_Commission_Draft.pdf)