



## PAN Europe's feedback on Commission's roadmap:

### “Towards a more comprehensive EU framework on endocrine disruptors”

**Background:** The ‘Community Strategy for Endocrine Disruptors (EDs)’ adopted in 1999 was set up to be in line with the precautionary principle, which aims at ensuring a higher level of environmental protection through preventative decision-taking in the case of risk. The strategy’s aim was to identify potential hazardous ED substances, to promote research to address the regulatory needs and to update EU legislation with tools to protect people, animals and the environment from the potential harm caused by EDs. Despite these political actions, today, in 2018, EDs are still not regulated properly. A set of criteria to identify pesticides and biocides that are EDs, assumes scientific knowledge and data that we currently don’t have. In fact, the criteria have been characterised unfit by scientific experts from the field of endocrinology and it remains unknown if any ED pesticides will be regulated at all. Even when scientific evidence reveals that these chemicals act as endocrine disruptors and have the potential to affect particularly the most vulnerable (children, infants and babies in the womb), the precautionary principle is not applied and these chemicals remain in the market for years putting the health of Europeans and the environment at risk (e.g. 2,4-D, chlorpyrifos, tebuconazole, cypermethrin). Moreover, it’s been decades that we know that we’re exposed to mixture of EDCs, that can have additive or synergistic adverse effects when combined, at much lower concentrations than each individual chemical alone. Still risk assessment overlooks these effects when establishing the acceptance daily exposure or food intake of pesticides/ or other chemicals. Regrettably, one could say that the updates in EU legislation to regulate EDs have been so far, “cosmetic”.

**The roadmap:** PAN Europe welcomes the Commission’s initiative to carry out the work of the strategy for EDCs and for confirming its commitment to protect EU citizens and the environment from dangerous chemicals. Nevertheless, we would like to address the following:

- The roadmap seems to focus to solve ‘a communication problem’ to calm down the citizens’ concerns about exposure to EDs. But it’s not just the EU citizens that are raising concerns and the problem is not based on communication. Experts in endocrinology are sending alarming messages for decades that these chemicals should be regulated properly. Endocrine-related cancers such as breast and prostate are on the rise, the cases of infertility are rising, and so is cognitive disorders as well as obesity and diabetes. In fact, an increased number of studies show long term effects of these chemicals that have not been captured by traditional toxicology
- The identification of EDs should be harmonised in EU legislation, as it happens with other hazardous chemicals under the CLP Regulation. However, the policy actions have to be different in each policy area depending on the use of the substance. For example, ED pesticides are sprayed on open fields and are found as food residues in our food; ecosystems

are exposed daily, affecting biodiversity and ecosystem services, and the health of farmers, their families, residents of agricultural zones, bystanders and finally consumers, is at risk. The pesticide regulation should aim at eliminating all ED pesticides from use in agriculture and management of green areas.

- A bigger emphasis should be given to the development and fast incorporation of adequate testing in the data requirements for all chemical legislations. For example, data requirements should endorse tests that focus on effects of chemicals during sensitive period of lifetime via alternations in hormone signalling. New signal pathways and adverse effects should be quickly incorporated in regulations. Currently this process may take decades, during which time people and the environment keep being exposed to these chemicals.