

# Swedish Concerns on the EDC Criteria Proposal

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# Outline

- **Why is the Swedish government concerned?**
- **Precautionary principle and cut-off criteria**
- **Definition of EDCs**
- **What do the criteria say?**
- **SE concerns**

# Why is Sweden concerned?



Non-Toxic Environment

Reduce children's  
exposure to hazardous  
chemicals

We need criteria to  
identify EDCs

(<http://www.kemi.se/en/about-us/our-work/action-plan-for-a-toxic-free-everyday-environment>)

# The precautionary principle

Rules in the PPR and BPR are underpinned by the precautionary principle

# Cut-off criteria

## PPPR:

“... it is not considered to have endocrine disrupting properties that **may cause** adverse effects in humans/non target organisms...”

## BPR:

“...are considered as having endocrine disrupting properties that **may cause** adverse effects in humans...”

# WHO's definition of EDCs

An endocrine disruptor is an exogenous substance or mixture that alters function(s) of the endocrine system and consequently causes adverse health effects in an intact organism, or its progeny, or (sub)populations.

A potential endocrine disruptor is an exogenous substance or mixture that possesses properties that might be expected to lead to endocrine disruption in an intact organism, or its progeny, or (sub)populations.

# But what does the criteria say?

‘...**known** to cause an adverse effect relevant for human health...’

‘... it has an **endocrine mode of action**,

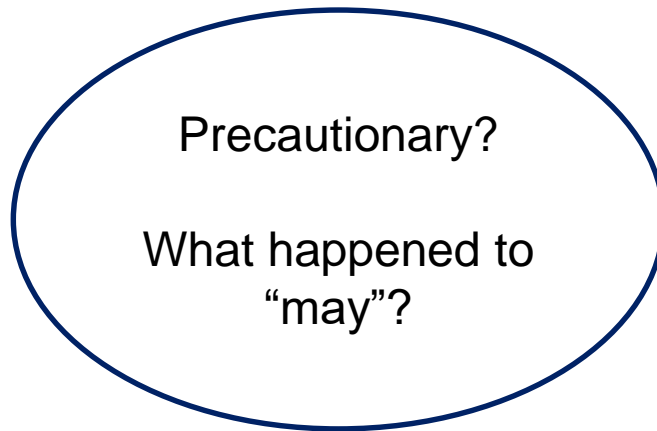
the adverse effect relevant for human health **is a consequence of the endocrine mode of action...**’

or presumed

“...known<sup>↙</sup> to cause an adverse effect relevant for human health...”



Proof that a substance causes cancer, infertility, diabetes, obesity etc in humans



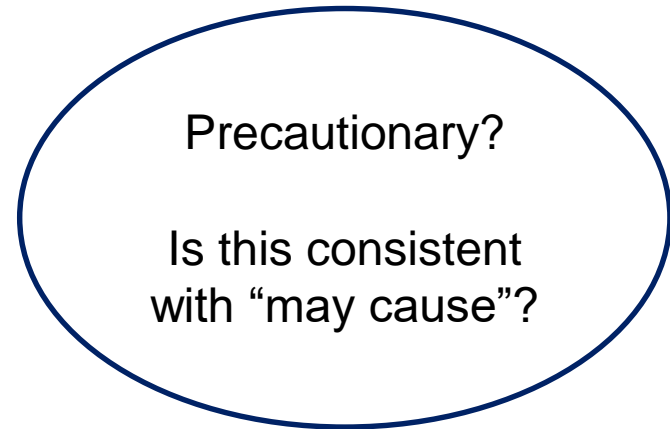


plausible

‘... it has an endocrine mode of action...’



It has to be shown how the endocrine system is affected and how this leads to cancer, diabetes, obesity, infertility etc.



# ...and there's another problem

## Now

- Derogation from cut-off criteria negligible **exposure** in PPPR

## Derogation proposal from COM:

- approval of EDC possible if **risk** is negligible



shift from **hazard** approach to **risk** approach

# Summary – SE position

**Criteria not workable and not in line with  
precautionary principle**

**Beyond the scope of Commissions  
implementing powers**



**Thank you for your attention!**