

The European Commission Communication Towards a comprehensive European Union framework on endocrine disruptors

ESE Statement

Endocrinology is the study of the complex communication between different organs to regulate essential body functions through signalling by chemical substances – hormones – in endocrine systems.. These complex and sensitive systems have to be maintained in balance through the different stages of human and animal life to avoid illnesses and growth and/or fertility problems, including the growth of the brain. Already before birth the endocrine system plays a central role in determining later development for example from child into adulthood.

European Endocrine Disruptors (EDCs) are chemicals that may interfere with the body's endocrine system and as such can cause a broad range of adverse effect to the personal health and wellbeing of humans and wildlife. They have been associated with a variety of rare cancers (especially in children), impaired reproduction, osteoporosis, thyroid disease, metabolic illnesses (e.g. diabetes, hypertension and obesity), birth defects and numerous other disease areas or health conditions.

The latest activity by the European Union in this area is the European Commission Communication towards a comprehensive EU framework for EDCs from November 07, 2018. In line with earlier recommendation by the ESE, the EC recognises the need for better testing methods and a broader, faster and effective approach towards EDCs beyond the EATS - oestrogen, androgen, thyroid hormone or steroidogenesis. The EC also made an important step in the right direction by acknowledging the adverse effects that a mixture of EDCs, or the "cocktail effect", could cause even if the EDCs individually might have no harmful consequences at very low concentrations.

ESE has hesitations about the effectiveness of an EDC Forum. In principle it applauds the EC for setting up such a forum as it enables broader stakeholder involvement and more transparent discussions on the issues at hand. At the same time, other EU health forums on alcohol and obesity, involving both NGOs and industry, are often criticized for being a talking shop with very limited concrete output. For the EDC forum to be effective, it needs clear ambitious objectives accompanied by a new comprehensive strategy on how and when to achieve them. The current strategy is from the year 1999 and is clearly outdated considering the scientific progress achieved in this field during the last two decades, the importance the issue has been given within society and the current prominent place of EDCs on the EU health agenda. Finally, the focus of such an EDC forum should be on preservation of health, the prevention of diseases and independent science. Finance and industry sponsored studies can be taken into account, but should never be guiding the decision making processes of the Forum.

Almost 20 years after the initial Community Strategy on endocrine disruptors, ESE is disappointed that the communication does not entail more concrete measures that would help to immediately identify and entirely stop the usage and further distribution of harmful EDCs. There is no mention of speeding up the current testing methods or the replacement of EDCs with safer alternatives. With regards to the latter

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there is only the promise of additional research in this area while many alternatives are known already and could start to replace EDCs as of now in a broad variety of products on the EU market.

A good example is phthalates used in plastics which can be found in numerous daily products such as shower curtains, children's rain gear, and in personal care products such as shampoos and cosmetics. Researchers found an alternative that, unlike phthalates, does not detach from the product and enter the body or the environment around us.

Hereby it is important to stress that not all replacements are automatically positive looking at the regrettable replacement of Bisphenol A by Bisphenol S, a chemical which mostly likely causes similar or additional harm to the body.

The Communication also does not address the current EU policies that allow continuous exposure of the body to small concentrations of EDCs such as Bisphenol A. These policies are not in line with the latest peer reviewed studies which conclude that smaller concentrations of EDCs can significantly disturb the balance of the endocrine system. As the endocrine system is generally regulated by means of small concentrations of hormone interactions, the studies underline a certain logic or common sense.

ESE calls on the EC and other EU institutions to look into the matter and meanwhile apply the “precautionary principle” until further research can determine the exact effects of small concentrations of EDCs on the body.

Even though the communication contains a number of good elements, it lacks ambition. The plan to perform a ‘fitness check’ on EDC aspects for already existing EU laws and regulations can be useful if it supports the immediate closing of current legislative loopholes that permit the industry to use alternative EU laws to ‘rehabilitate’ a compound identified as an EDC under other EU legislation. currently the practical definitions of EDC are for example not the same in the EU biocide vs. the EU pesticide regulation. Once a compound is identified as an EDC under EU law, it should not be able to still find it’s a way to the EU market though a legislative loophole.

If this specific issue is not addressed, the fitness check will most likely only further delay the implementation of urgently needed measures beneficial to the general health of the EU population.

ESE stands ready to further work with the EC on implementing current planned activities in this field while starting a dialogue with the EC and other stakeholders on a number of more ambitious next steps as outlined above. We cannot further procrastinate this important issue and continue to expose humans and wildlife to the severe consequences of EDCs.

ENDS

This statement has been developed by the ESE Endocrine Disrupting Chemicals Working Group:

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