



Friday, 17th of June 2016

Women in Europe for a Common Future | WECF

Honourable State Secretary S. Dijkma,

We are writing to you on behalf of WECF International as part of the EDC-Free Europe, a coalition representing over 70 organisations who have come together because of our concern about endocrine disrupting chemicals (EDCs).

The EDC-Free Europe coalition strongly condemns the Commission proposal for criteria to identify endocrine disrupting chemicals (EDCs) presented on June 15th. It will fail to protect wildlife and to address this urgent public health threat. We have reason for concern – over 1,300 studies have linked EDC exposure to serious health problems including infertility, diabetes, obesity, hormone-related cancers and neurological disorders.

We see two major problems with the proposals which we ask you to rectify:

- 1) The Commission proposes to identify EDCs only if they have been proven to cause adverse effects in humans or non-target organisms.** Requiring this unprecedentedly high level of proof means that humans and the environment will most likely have to be harmed before action is taken. This level of proof is incoherent with the usual approach taken in the EU for e.g. identifying carcinogens which uses both the wording `known` (CLP cat 1 A) and `presumed` (CLP cat 1B). ***The proposal will have wide ranging implications for all EU chemicals laws and therefore needs to be changed in order to ensure coherence, and to protect wildlife and people.***
- 2) The Commission proposes amendments to the Plant Protection Product Regulation that alter the agreement taken between Council, European Parliament and Commission in the co-decision procedure.** They propose changing the legal text from endocrine disruptors that “*may cause adverse effect*” to endocrine disruptors “*known to cause an adverse effect*”. Furthermore, the Commission goes beyond their task on identification criteria and actually reintroduces new specific risk assessments for all EDC pesticides, which changes the balance and approach agreed between Council and Parliament. ***They propose widening an existing exemption into a major loophole for those cases where chemicals have been identified as EDCs (changing `negligible exposure` to `negligible risk`).*** This would allow continued uncontrolled exposure to these chemicals of high concern.

We therefore call on you to use the opportunity at the **Environment Council meeting on Monday, 20th** of June, to insist on major changes. Thank you very much for ensuring a high level of protection for human health and the environment, preventing endocrine-related diseases for Europeans and averting damage from our ecosystems.

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In the view of the public interest in this matter we will make this letter available more widely.

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