

HEJSupport`s response to

EU Commission`s "Roadmap: Towards a more comprehensive EU framework on endocrine disruptors"

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https://ec.europa.eu/info/law/better-regulation/initiative/255075/attachment/090166e5bba46e82_en

HEJSupport welcomes that the EU Commission is becoming active on the topic of endocrine disruptors (EDs). This is a long overdue step, after the commitment in the 7th Environment Action Plan from 2013 to minimize the exposure to endocrine disruptors¹, and the European Council conclusions from 2016, which reiterates the need to **protect** humans and the environment from EDs and invites the EU Commission to update the 1999 EU strategy on endocrine disruptors as appropriate². However, although the need for exposure reduction was explicitly highlighted in both documents, the roadmap does not emphasize on that important demand. Activities to reduce exposure to EDs are not listed under potential types of actions. Therefore, **we strongly urge the EU Commission to include a list of activities to force exposure reduction in their Communication to protect human health and environment in the EU.**

Although an EU Communication is a step in the right direction, it is important that the EU Commission will develop an EU EDC strategy as soon as possible. **This strategy and also the presented Communication should include the following essential elements:**

- Public health, precaution and exposure reduction should be the cornerstone of a new EU EDC strategy
- Regulation should be improved and the control of the use of EDCs should be controlled across all sectors
- The regulatory substance-by-substance approach should be replaced by regulation of problematic groups of EDs
- Testing, screening and identification should speed up
- To achieve a clean circular economy EDs in products should be avoided from the start
- Safer substitution and promotion of innovative solutions, like agroecology, should be enhanced
- Health and environmental effects of EDs and EDC exposure should be monitored to be able to respond swiftly to minimize them.

Additionally to the mentioned elements, **awareness raising among EU citizens should be highlighted** and suitable programmes should be established in the Communication and in a

future EU EDC strategy. Especially most vulnerable groups, like pregnant women, are not aware of the health effects of EDs in the products they use and in their environment. Information materials for medical, health and educational professionals are urgently needed, so that they can advise the public on reducing their exposures. Disclosure of EDs and other chemicals in products is needed to ensure the right to know of citizens.

The EDC Free Europe Alliance, of which HEJSupport is a member, called on EU Commission President Jean-Claude Juncker to bring out a fully-fledged strategy before the summer of 2018. **The joint position of the Alliance presents more details of our demands for an EU-EDC strategy, which should be included in the roadmap.** (<http://www.edc-free-europe.org/wp-content/uploads/2018/05/EDC-Free-statement-on-EU-EDC-Strategy-final-EN1.pdf>)

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¹ DECISION No 1386/2013/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 November 2013 on a General Union Environment Action Programme to 2020 'Living well, within the limits of our planet', <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D1386&from=EN>

² EU Council Conclusions, 19th of December 2016, <http://data.consilium.europa.eu/doc/document/ST-15673-2016-INIT/en/pdf>