

Submission on the IOMC EDC workplan for the Global Framework on Chemicals

Thank you very much for the opportunity to comment on the presented workplan on EDCs by IOMC at the webinar on Existing Emerging Policy Issues and other Issues of Concern on March 19, 2026.

General remarks:

- EDCs remain an unresolved issue and require continued coordinated international action.
- The importance of EDCs as a standalone issue of concern is underscored by the state of the science and their ubiquitous presence in the environment and in humans, posing significant risks to health and the environment.
- Mainstreaming the issue of EDCs only in other workstreams is not sufficient
- Keep EDCs as an loC under GFC, with an ambitious workplan and robust funding - as expressed by the vast majority of members of the contact group on Issues of Concern (UNEP/GFC/OEWG.1/14)
- The process for developing the loC workplans is often unclear to stakeholders. There should be a clear and inclusive pathway with commenting periods and opportunities to engage.
- We agree with the high-level areas of work identified in the September 2025 consultation (not publicly accessible?) and presented at the March 19, 2026, IOMC Webinar

Comments on the bullet points presented (see screenshot) and on the gaps that we identified:

- Mainstreaming the issue of EDCs in Implementation Programmes and other workstreams is a given in certain workstreams and should be continued, however
 - if there are no suitable workstreams specifically focusing on EDCs, there is a high risk that the work on EDCs will not be continued
 - if there is no workstream focusing on EDCs in articles, there is a risk that targets B2 and B3 under the GFC will not be fully implemented
- The dissemination of the updated UNEP/WHO State of the Science Report and the planned information sharing activities should be inclusive and accessible (e.g. in various languages) for all. Information sharing should continue long-term after the report is launched.
- How should the support action on EDCs in key industry sectors look like? It is key to include activities on safer alternatives, third-party assessment process, prevention of regrettable solutions, phase-outs, and the promotion of non-chemical alternatives. In addition, support for regulators in the global south and civil society should be included in the work plan.

- The development of the OECD Test Guidelines is important and should include regulators and civil society, especially from the global South

Identified gaps in the list of possible activities:

- EDC, as a new hazard class under the GHS, is an important aspect that needs to be considered to ensure that GHS classes fully capture EDCs multiple serious health endpoints beyond cancer
 - Comprehensive identification of EDCs based on internationally recognized definitions and harmonized assessment standards
- Support the prevention of regrettable substitution by requiring alternative assessments by a third party and promoting safer non-hazardous solutions -> implement measures that decrease exposition
- Support countries in developing and enforcing strong regulations at a national, regional and international level to reduce human and environmental exposure to EDCs
- Development of model laws aiming to reduce the production, use, and pollution of EDCs
- Support of scientific research that fills knowledge gaps, including generating sex and gender differentiated data.
- Monitor EDC exposure frequently linked with regulations brought in place and the volume of production
- Link activities on EDCs with other IoC workplans instead of mainstreaming
- Link EDCs activities also with implementing the Gender Action Plan and national Gender Action Plans
- Establish a knowledge-sharing platform on EDCs, assessment, and regulations
- Advance the identification of ED pesticides, extend measures to prevent or minimise exposure from EDCs to the pesticide cluster and link activities to the HHP IoC.

Thank you for the consideration of our recommendations. We are happy to discuss the presented points further with you. When is the announced consultation planned, and how can we participate?

Best regards,

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