

Consultation on the Roadmap for Chemicals Strategy for Sustainability

ESE Response

The European Society of Endocrinology (ESE), together with its 54 national and 13 specialist societies, aims to lift standards of care in endocrinology across Europe. ESE's vision is to shape the future of endocrinology to improve science, knowledge and health. At the EU level, ESE has focused its activities mainly around Endocrine Disrupting Chemicals (EDCs). These efforts, including this response, are led by the ESE EDC Working Group chaired by Prof Josef Köhrle, affiliated to the Charité University in Berlin.

Context

EDCs are still widely prevalent in the EU and disproportionately affect vulnerable populations. EDCs 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 health conditions. ESE therefore welcomes the ambition of the Commission to create a non-toxic and safe EU environment.

The COVID-19 pandemic has demonstrated achieving a non-toxic environment is needed more than ever. There is increasing evidence that people with endocrine disorders such as obesity and diabetes are particularly vulnerable to COVID-19 and other viruses.

Addressing EDCs could also contribute to economic recovery. Economic analysis by the Endocrine Society reveals that EDCs cost the EU27+UK between €157 and €270 billion per year in healthcare expenses and lost earning potential. That is up to 2% of European GDP¹. Large contributors are neurodevelopmental and metabolic disorders as well as cancer.

ESE supports the Commission's goal to build a more resilient EU society. Our shared objective is to mitigate the future impact of pandemics and endemics, likely to become more frequent. For this, creating a healthier environment with reduced exposure to EDCs is key. In other words, creation of a non-toxic, healthier environment should be viewed as a preventive measure against pandemics/endemics.

EDC criteria and policy changes

There is an urgent need for consistent definitions, criteria and identification data requirements for EDCs across all EU legislation. Existing inconsistencies in EU legislation have led to numerous legislative loopholes. The REACH regulation urgently needs clear criteria and guidance on how to identify EDCs. Data requirements should also be identical under pesticide/biocides legislations. They are only 'very similar' which creates a fundamental issue, provoking confusion, conflicts and a lack of practicability and credibility. We also support the effort to have substances reviewed by one agency.

ESE urges the Commission to develop new guidelines for the burden of proof required for an EDC to be classified as such. Currently the level of evidence required for EDC identification as laid out in the ECHA/EFSA/JRC guidance document (2018) is unrealistic. It was only possible to meet the evidence requirements for BPA because of the abundance of available information on this substance. It is highly unlikely to be possible for many other substances. We encourage the Commission to truly commit to the precautionary principle by adjusting the burden of proof in line with its application of the principle during the coronavirus and other public health emergencies (e.g. SARS, avian flu, mad cow disease).

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A coordinated funding effort is needed to stimulate independent research in the area of EDCs. This is a prerequisite in order to obtain impartial insights into the impact of EDCs on the population and to ensure additional scrutiny of widely prevalent chemicals in everyday products and the environment.

ESE stands ready to support the Commission in its endeavour to reduce EDCs in the EU environment. Through its access to Europe's leading experts, ESE is in a unique position to provide independent scientific advice on a wide range of EDC related topics and contribute to better understanding and therefore better regulation.

ⁱ Endocrine Society (2020). Estimated Costs of Endocrine-Disrupting Chemical Exposure Exceed €150 Billion Annually in EU. Available at: <https://www.endocrine.org/news-and-advocacy/news-room/2015/estimated-costs-of-endocrine-disrupting-chemical-exposure-exceed-150-billion-annually-in-eu> - date accessed: 01/02/2020