

July 11, 2017

Dear Members of the Environment Committee,

On behalf of the Endocrine Society, the European Society of Endocrinology and the European Society for Paediatric Endocrinology, we are writing to express our serious concern with the criteria that were validated following the proposal on endocrine disruptors (EDs – also referred to as endocrine-disrupting chemicals or EDCs) from the European Commission. As the world's leading experts in endocrine science and endocrine disease, we call on you to ensure that implementation of the criteria is supported by a transparent process that incorporates the expertise of endocrine scientists.

As scientific and medical professional societies devoted to the study of hormone-related diseases and disorders, we recognize that EDCs contribute to serious health problems such as diabetes, obesity, and neurodevelopmental and reproductive disorders. These diseases affect the health and quality of life for people around the world, and scientific criteria to effectively identify and regulate EDCs are critical to ensure the health and well-being of the public for this and future generations. While the Commission's proposal received a majority vote from the representatives of Member States, these votes do not reflect the scientific evidence surrounding EDCs that is shared by leading scientific groups such as our societies. We have repeatedly stated that the criteria are scientifically unsatisfactory<sup>1</sup>.

The criteria will likely fail to identify some EDCs that are currently causing human harm because they do not integrate a process to address those chemicals where additional scientific evidence may be needed to arrive at a suitable level of confidence for a determination. This process is needed because the pace of scientific knowledge on potential EDCs is increasing rapidly, as demonstrated by recent reviews of the peer-reviewed scientific literature wherein many studies were published in the last decade<sup>2</sup>. Also, the criteria contain arbitrary exemptions that could delay recognition as EDC of chemicals specifically designed to disrupt target insect endocrine systems. Insect endocrine systems have similarities to endocrine systems in wildlife and humans, and we strenuously object to the addition of hazardous loopholes in the criteria. This creates divergent

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<sup>1</sup> Foucart, S., and Horel, S., *Perturbateurs endocriniens: les scientifiques alertent sur le laxisme de Bruxelles*. Le Monde, June 17, 2017. Accessed online at: [http://www.lemonde.fr/planete/article/2017/06/17/perturbateurs-endocriniens-les-scientifiques-alertent-sur-le-laxisme-de-bruxelles\\_5146113\\_3244.html](http://www.lemonde.fr/planete/article/2017/06/17/perturbateurs-endocriniens-les-scientifiques-alertent-sur-le-laxisme-de-bruxelles_5146113_3244.html)

<sup>2</sup> Gore, A.C., et al., *Executive Summary to EDC-2: The Endocrine Society's Second Scientific Statement on Endocrine-Disrupting Chemicals*. *Endocr Rev*, 2015. **36**(6): p. 593-602.

frameworks wherein certain chemicals that are designed to be EDCs cannot be defined as EDCs in the context of applicable laws, or are recognized as such with delay. **Therefore, the criteria will not be effective in protecting public health and will not secure a high level of health and environment protection as required per Treaty on the European Union (EU).**

We appreciate that many details regarding the implementation of the criteria still need to be worked out, and we call for transparency on how contributions from endocrine scientists will be given due consideration in the process used by the European Food Safety Authority (EFSA), the European Chemicals Agency (ECHA), and the European Commission. In advance of the forthcoming vote on the criteria by the European Parliament, we encourage you to gather input from endocrine scientists and professional endocrine associations during your deliberations.

Our societies are disappointed that the criteria do not create a coherent system for the identification of EDCs similar to the identification scheme applied for carcinogens. A similar hazard-based identification process with a process to evaluate those chemicals where additional scientific evidence may be needed, without derogations based on risk or on negligible exposure, would ensure better human health protections, especially for those populations who are highly vulnerable to the effects of EDCs, such as women and children. Thank you for considering our comments. If you have any questions, or would like to connect with an expert endocrine scientist, please contact Joseph Laakso, PhD, Associate Director of Science Policy at [jlaakso@endocrine.org](mailto:jlaakso@endocrine.org).

Sincerely,



Prof. Angel Nadal, PhD  
Chair, Endocrine Society EDC Advisory Group



Prof. A.J. van der Lely, MD PhD  
President of the European Society of Endocrinology



Prof. Peter Clayton, MD, MRCP, FRCPCH  
Secretary-General, European Society of Paediatric Endocrinology