

**WRITTEN STATEMENT BY ENDOCRINE SOCIETY
TO THE HIGH-LEVEL ROUNDTABLE ON THE CHEMICALS STRATEGY FOR
SUSTAINABILITY (CSS)**

PRIORITIES

The Endocrine Society has three priority goals to limit exposure to endocrine-disrupting chemicals (EDCs), also referred to as endocrine disruptors, which we hope the Roundtable will discuss and advance in the context of implementation of the CSS. Achieving these goals will have tangible public health and environmental benefits and ultimately contribute to the overall success of the CSS.

We refer to the Society's Scientific Statements on EDCs of 2009 and 2015, as well as our 2018 Position Statement on EDCs in the EU.

- Faster and more effective identification processes for EDCs
- Removing harmful endocrine disrupting substances from consumer products and the environment
- Strengthening data requirements for EDCs through updated testing and screening methods.

Faster and better identification of EDCs

This can be achieved via a hazard-based horizontal approach under REACH and the CLP (Classification and Labelling of Products) Regulation. We also support the inclusion of a category of *suspected* EDCs with regulatory consequences, which would allow protective actions to apply to many more EDCs. It is vital to speed up the identification of EDCs because despite scientific evidence generated about numerous chemicals, including classes of chemicals, only around 20 EDCs have been formally identified so far.

Remove endocrine disrupting substances from consumer products

We assert that EDCs should be regulated in a similar manner to carcinogens and other CMRs.

We support prompt actions, as a priority, to ensure that chemicals that interfere with endocrine systems are removed from everyday consumer products, except for essential uses, in order to minimise public exposure. We support the grouping of restrictions under the generic approach to risk management, which will help to streamline regulatory processes to achieve this goal.

Many consumer products still contain EDCs and substances which are anticipated to have hazardous endocrine disrupting properties. Human biomonitoring research, as in the HBM4EU, shows significant levels of exposure to the public including unborn children and babies, who are undergoing rapid developmental changes such as neurodevelopment, mediated by endocrine systems. Moreover, many communities, in particular low-income communities and other marginalized groups, face disproportionate EDC exposures and effects.



Strengthen data requirements for EDC identification and update testing and screening methods

There is an urgent need to improve and update data provisions for EDCs in order to provide sufficient data for accurate identification. Updated testing and screening methods are required that utilize the latest science and sensitive, clinically relevant endpoints.

MAIN EXPECTATIONS:

Our main expectation of the Roundtable is that it will ensure the CSS objectives are fully implemented in a timely way to prevent further damaging and costly health & environmental impacts. Our main areas of contribution to the Roundtable among the specific tasks are:

- To provide a comprehensive knowledge base on EDCs
- To use the Society's global networks to inform of the EU approach and ongoing debate.
- To facilitate mutual understanding of the Chemical Strategy among the scientific and medical communities that we represent.

TOPICS TO DISCUSS:

We particularly support the following topics for discussion:

- a. among list provided:
 - Consumers' protection from hazardous chemicals
 - Preventing chemical pollution in the environment, including from multiple sources
 - Global sound management of chemicals.
- b. Proposed topics:
 - Hazard-based approach to assessment_of chemicals
 - Fully science-based EU policy-making
 - Environmental justice: meeting the needs of communities facing disproportionate exposures
 - Development and inclusion of more sensitive test methods

THE INDUSTRIAL TRANSITION

Policy tools for transition:

Incentives: A transition will work when there is an incentive to stop using harmful chemicals. Otherwise new solutions will find it more difficult to get onto the market

Economic investments: We need policy tools and impact assessment that look at costs to society as a whole. Currently the costs for health impacts from chemicals or the costs for clean up (e.g. drinking water purification) are borne by society. A focus on economic costs borne by industry through the



transition, while not taking into account the public health benefits, can easily distort the true economic picture.

An economic analysis of exposure to endocrine-disrupting chemicals across the EU found a likely cost to the European Union of €157 billion a year due to health care expenses and lost earning potential. The analyses were published in the *Journal of Clinical Endocrinology and Metabolism* and are based on data from over three decades of studies of EDCs in the EU. These costs not only represent significant economic damages, but reflect increased disease and human suffering that is borne by the general population.

Simplification We need simplification of regulatory measures to support effective action, such as using a group or class-based approach to chemical assessments which can help prevent regrettable substitutions.