

**Submission by the Endocrine Society to the European Commission public consultation on the adoption of a proposal for the revision of EU legislation on hazard classification, labelling and packaging of chemicals (CLP)**

30 March, 2023

The Endocrine Society welcomes the opportunity to comment on the proposal to amend Regulation (EC) No 1272/2008 of the European Parliament and of the Council on classification, labelling and packaging of substances and mixtures (CLP). As the world's leading experts on the subject of chemical interference with endocrine systems, we support provisions in the amended regulation that would allow EU regulators to more effectively minimize exposure to endocrine-disrupting chemicals (EDCs) and thereby reduce the incidence of chronic diseases associated with EDC exposure such as cancer, diabetes, neurodevelopmental disease and infertility.

In particular, we enthusiastically encourage the rapid implementation of the new hazard classes for endocrine disruptors (EDs) and multiple categories for EDs for human health and the environment based on the strength of available evidence. By including these classes and categories, with actions to minimize exposure to EDCs in both categories 1 and 2, policymakers will be able to more effectively identify chemicals that interfere with endocrine systems and incorporate new scientific information as it becomes available. We further support the use of these categories and classes to identify and take action on groups of chemicals with similar structure and/or activity, to reduce the incidence of regrettable substitutions within classes of chemicals such as bisphenols and PFAS. As myriad new chemical entities are introduced into commerce every year, these categories will be critical to maintaining vigilance and assessing substances for effects on endocrine systems that may negatively impact public health.

We commend the Commission's efforts to amend the CLP regulation to better protect human and environmental health from endocrine disruption and are encouraged that the European Union will continue to be recognized as the global leader in establishing such measures. We maintain that the amended regulation will play an important role in improving public health if, following adoption, regulators are able to effectively identify EDs with appropriate levels of evidence so that action can be taken under REACH and other EU legislation to minimize exposure to these hazardous substances. We therefore urge swift adoption of the proposal and harmonization of other legislation, including REACH, to ensure consistency, predictability, and effectiveness across EU regulations.