

Submission by the Endocrine Society to the European Union Public Consultation on the mid-term review of the 8th Environment Action Programme (EAP). Developed by the Society's European Union Task Force.

January 26, 2024

The Endocrine Society appreciates the opportunity to comment on the mid-term review of the 8th Environment Action Programme (EAP) in support of the vision of living well, within planetary boundaries. Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization dedicated to the understanding of hormone systems and the clinical care of patients with endocrine diseases and disorders. Our membership of over 18,000 includes researchers who are making significant contributions to the advancement of knowledge in toxicology, especially in the field of endocrine-disrupting chemicals (EDCs).

Within the EAP as described, we enthusiastically welcome the prioritization of a transition to a non-toxic circular economy and “pursuing zero pollution, including in relation to harmful chemicals ... and protecting the health and well-being of people, animals, and ecosystems.” Minimizing exposure to hazardous EDCs is central to these priorities, and while we are encouraged that the EAP recognizes the need to swiftly substitute endocrine disruptors and other substances of very high concern and address combination effects of chemicals on health and the environment there is a need for regulation to effect such actions and these legislative proposals have not yet been presented by the Commission.

To ensure that the Commission can meet these priorities and objectives related to chemicals, headline indicators should be developed that will provide an estimate or measure of the totality of hazardous chemicals used across the economy and introduced to the environment. For example, an estimate of the combined production volumes of classes of chemicals, inclusive of chemicals that have been shown to have adverse effects on endocrine systems such as bisphenols, phthalates, flame retardants (including novel brominated and chlorinated chemicals), PFAS and other fluorinated compounds, would provide a benchmark value that authorities could measure against to assess effectiveness at reducing exposures to human health and wildlife. We stress that recycling, while necessary to achieve a circular economy, does not eliminate the potential exposure to hazardous chemicals used e.g., in plastics, which include EDCs; therefore, indicators assessing human population and environmental chemical exposures themselves are necessary in the context of the priorities and objectives addressing chemicals. Consistent with needs and objectives identified through the HBM4EU project, indicators should include human and environmental biomonitoring for chemical exposures, including EDCs, in combination with health examination studies. Such indicators should be measured on a regular basis to assess progress in improving public and environmental health.

Thank you for considering our comments, we look forward to engaging with the Commission and agencies in pursuit of the vision of the EAP.