29 February 2016

Dear Environment Minister,

We are writing to you on behalf of EDC-Free Europe, a coalition representing 68 organisations who have come together because of our concern about endocrine disrupting chemicals (EDCs). Scientists, health professionals and medical doctors have increasingly warned that EDCs can contribute to diseases and disorders like hormonal cancers (prostate, testicular, breast), reproductive health problems, impaired child development, and obesity and diabetes. We urge you, at the upcoming Environment Council, to make a strong statement calling on the European Commission to immediately comply with the ruling of the European Court of Justice on scientific criteria to identify Endocrine Disruptors (Case T-521/14 Sweden vs. Commission).

The Court found that no impact assessment was legally required to produce the scientific criteria, and that any work on the impact assessment did not justify missing the legally binding deadline (Paragraph 74). Hence, any work on or from the impact assessment cannot be used to help decide or influence the final criteria, as the impact assessment is entirely irrelevant to the final completion and adoption of scientific criteria for identification of EDCs.

The Court found that the criticisms of the proposed draft scientific criteria from June 2013 did not justify missing the deadline (Paragraphs 69, 70, 71). Hence, the draft criteria were appropriate for submission to Inter-Services Consultation, and still are.

The Court also found that the criteria to determine endocrine disrupting properties can only be done in an objective manner, based on scientific data in relation to the endocrine system, independently of any other consideration (Paragraph 71). Therefore, the criteria must identify endocrine disrupting properties, based on interpretation of existing data, irrespective of any considerations about which endocrine disrupting chemicals might be of greater or lesser regulatory concern. Hence, the criteria should not include aspects related to ‘hazard characterisation’ (severity of effects, reversibility, and potency).

In our view, the simplest and most robust reflection of the scientific data on endocrine disrupting properties is captured with three categories (Option 3 of the roadmap). It is also the approach that follows the existing categorisation scheme for Carcinogens, Mutagens and Reproductive Toxicants.

We look to you to take a clear position after the release of the Court judgement in December 2015 and the Commission’s subsequent responses. Although we believe that having identification criteria with 3 categories enables pragmatic yet accurate reflection of the science, we acknowledge that for compliance with the Court judgement, the simplest way to proceed would be with an Inter-Services Consultation on the June 2013 draft criteria as soon as possible.
Sincerely,

Genon K. Jensen, Executive Director, HEAL on behalf of EDC-Free Europe

ON BEHALF OF:

Center for International Environmental Law (CIEL)
ChemSec
Client Earth
Greenpeace
Health and Environment Alliance (HEAL)
Health Care Without Harm Europe (HCWH)
Pesticide Action Network Europe (PAN Europe)
Women in Europe for a Common Future (WECF)
Action for Breast Cancer
Action Cancer du Sein du Quebec
Alliance for Cancer Prevention
A.P.E.D.D.U.B Association pour la Protection de l’Environnement et le Développement Durable de Bizerte
Baltic Environmental Forum
Breast Cancer UK
Breast Cancer Action
BUND (Friends of the Earth Germany)
The Cancer Prevention & Education Society (CPES)
Centre Ecology and Health
Chapaevsk Medical Association
CHEM Trust
Comité pour le Développement Durable en Santé CZDS
Commonweal
Corporate European Observatory
Danish Consumer Council
The Danish Ecological Council
DES Daughter
Eco Accord
Ecobaby Foundation
Ecocity
Ecodes
Ecologistas en Acción – Ecologists in Action
European Academy of Environmental Medicine EUROPAEM
Fodesam (Fondo para la Defensa de la Salud Ambiental)
France Nature Environnement
Fundación Alborada
Fundación Vida Sostenible
Fundacion Vivosano
Générations Cobayes
Générations Futures
Gezinsbond
Global 2000
Hipoalergiczni
Indiana Toxics Action Project
Initiativ Liewensufank
Inter-Environnement Wallonie
Irish Doctors Environmental Association IDEA
International Society of Doctors for the Environment ISDE
ISTAS
IVU e.V International Verein fur Umwelterkrankte
Macedonian Association of Doctors for the Environment MADE
Mediterranean Information Office for Environment, Culture and Sustainable Development (MIO-ECSDE)
Naturskyddsföringen / Swedish Society for Nature Conservation
PAN Germany
Physicians For Social Responsibility – Los Angeles
Phyto Victimes
Quercus – National Association for Nature Conservation
Réseau Environnement Santé (RES)
Scottish Hazards Campaign
Stiching Huize Aarde
TEDX The Endocrine Disruption Exchange
The European Consumer Organisation (BEUC)
TOXISPHERA Environmental Health Association
Union of Construction, Allied Trades and Technicians UCATT
WECF France
WECF Germany
WECF Netherlands
Wemos
Women Environment Network
Breast Cancer UK
Preventing breast cancer

BUND
friends of the earth Germany

ecologistas en accion

Doctors for the environment

Action for Breast Cancer Foundation

Breast Cancer Action

c2ds
comité développement durable santé

Forbrugerrådet
Tænk
Danish Consumer Council

DES Daughter Network
Because Social Media increases awareness and brings the DES Community Together

Stichting Ecobaby
non gouvernementele Nederlandse organisatie opgericht in 1996

#GénérationsCobayes
#nonmerci

France Nature Environnement

Fundación Alborada

Gezinsbond

GLOBAL 2000

Res

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PAN Germany
Pestizid Aktions-Netzwerk e.V.

Women's Environmental Network
Working for environmental justice through feminist principles

BEUC
The European Consumer Organisation

Academy for Environmental Medicine