



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.**

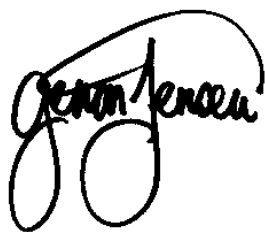
The Court found that the criticisms of the proposed draft scientific criteria from June 2013 did not justify missing the deadline (Paragraphs 69, 70, 71). **Hence, the draft criteria were appropriate for submission to Inter-Services Consultation, and still are.**

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,

A handwritten signature in black ink, appearing to read "Genon Jensen". The signature is fluid and cursive, with a large loop at the end.

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 C2DS

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-ECSD)

Naturskyddsföreningen / 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

Stichting 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







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