

September 21, 2020

Stella Kyriakides
Commissioner, Health and Food Safety
Rue de la Loi / Wetstraat 200
1049 Brussels, Belgium

Re: Endocrine Disruptors and EU Chemicals Strategy for Sustainability

Dear Commissioner Kyriakides:

Following our helpful meeting with you in May and your invitation for further collaboration we are contacting you on behalf of the Endocrine Society to express concerns regarding aspects of the debate on the Chemicals Strategy for Sustainability – in particular proposals to weaken calls to action to reduce exposure to endocrine-disrupting chemicals (EDCs).

As we discussed, in view of the clear scientific evidence of harm to health from exposure to low levels of endocrine disruptors, it is urgent that the EU takes further action based on hazardous properties of EDCs to minimize citizens' exposure. This is particularly important in the context of emerging evidence linking exposure to EDCs and increased vulnerability to respiratory diseases such as Covid-19¹².

We presented our key priorities for action to you in May:

1. *A horizontal EU identification of EDCs with adequate testing requirements to provide data*
2. *A strong hazard-based approach to prioritise reducing exposure to EDCs where exposure is widespread, such as in food packaging, cosmetics, personal products, food additives.*
3. *Controls of identified EDCs applied in a consistent way across policy areas.*

Earlier this summer we heard media reports about proposals to weaken the draft Strategy by DG GROW, in response we recently sent the attached letter of concern to Vice-President Timmermans, together with signatories from scientific associations from across Europe. We are extremely concerned that objections continue to be raised by various DGs on the proposals for actions on EDCs. In particular, we understand that the key principle of a hazard-based assessment is once again being challenged despite the scientific adoption of a hazard-based approach for both pesticides and biocides legislation. Because of the unique features of EDCs, including the ability to act at very low doses and with non-monotonic dose response, it is imperative that a hazard-based approach be used as the basis for action on EDCs.

The current scientific consensus, based on an extremely large body of scientific knowledge demonstrating that EDCs contribute to human health harm including diabetes, obesity, adverse pregnancy outcomes, neurodevelopmental and reproductive disorders, and compromised newborn and children's health is more than

¹ Q. Wu et al., Endocrine disrupting chemicals and COVID-19 relationships: a computational systems biology approach. *medRxiv*. doi: <https://doi.org/10.1101/2020.07.10.20150714>. Accessed Sep. 18, 2020.

² H. Ouleghzal et al., Is there a link between endocrine disruptors and COVID-19 severe pneumonia? *Heart Lung*. 2020 Jun 9



sufficient as a basis for urgent action. We feel this moment is a unique opportunity to take action to improve citizens' health by removing some of the most harmful chemical pollutants which they encounter in daily life.

We therefore call on you to show leadership on behalf of EU citizens and their future health and environment by ensuring that the EU Chemicals Strategy fulfils its promise to reduce chemicals pollution, and specifically reducing exposure to endocrine disrupting chemicals. This promise was made by Commission President van der Leyen last year and repeated in the European Green Deal. As scientists, clinicians, and citizens, we sincerely hope this promise will be upheld.

Sincerely,

Barbara Demeneix, PhD, DSc
Chair, Endocrine Society EDC Advisory Group