







To the European Commission: President Ursula von der Leyen, Vice President Frans Timmermans, Vice President Maroš Šefčovič, Vice-President Margrethe Vestager, Commissioners Thierry Breton and Virginijus Sinkevičius

The European Society of Endocrinology (ESE), the Endocrine Society (ES), the European Society for Paediatric Endocrinology (ESPE) and the European Thyroid Association (ETA), together representing the majority of European and global experts in endocrine disruptors, feel compelled to react to the European Commission's proposed delay in the publication of their proposal for the REACH revision to Q4 2023.

We are surprised that this revision, originally scheduled for 2022, has been moved to the end of 2023 in the European Commission work programme of October 18, as we understand that the drafting of the proposals is well underway. If the European Commission upholds this timing, this urgent revision will not pass its first reading before the European Parliament elections, which will mean not only further delays, but also a risk to the survival of the revision in the next legislature as the dossier may be pushed to the back of the line again or neglected entirely.

While we realise that these are turbulent times, we fail to understand why this should prevent action on urgently needed public health measures in the interest of the EU population, our children and our general environment on which we are all crucially dependent.

We are particularly concerned by the urgent need to minimise further exposure to Endocrine Disrupting Chemicals (EDCs). EDCs have been associated with a variety of rare and more prevalent cancers, infertility in men and women, osteoporosis, thyroid disease, metabolic illnesses (e.g., diabetes, hypertension and obesity), birth defects and numerous other disease areas or health conditions. Children are uniquely susceptible to these adverse health consequences already during foetal development, facing for example higher risk for obesity and neurodevelopmental impacts (e.g. lower IQ, attention-deficit/hyperactivity disorder [ADHD] and autism). Moreover, early life EDC exposures may alter development during sensitive stages such as infancy and adolescence with permanent consequences later in life. The science is clear, regulatory action is needed to address the harms of EDC exposure.

Furthermore, the COVID-19 pandemic has illustrated why achieving a non-toxic environment is more urgent now than ever before. There is increasing evidence that people with endocrine disorders such as obesity and diabetes are particularly vulnerable to COVID-19 and other viruses. There is also emerging evidence that EDCs increase the prevalence and severity of diseases that result in worse COVID-19 outcomes. Minimising EDC exposure is a necessary part of reducing mortality from COVID-19 and other pandemic diseases.

While we welcome the progress made in proposals to revise the CLP Regulation to introduce a hazard class for the identification of EDCs, this is of little use unless REACH introduces upgraded measures to prevent harmful exposure.

Our scientific and medical community therefore deeply regrets this delay in proposing the revision to REACH, which potentially means not seeing an improvement in European citizens' health and daily lives for the foreseeable future.









Further delay of the REACH revision would also endanger the European Commission's own green agenda and undermine the implementation of the Green Deal and the Chemicals Strategy for Sustainability.

We call on the European Commission to give priority to accelerating its work on the proposed REACH revision and to publish its proposals no later than March 2023 to ensure they can adopt it or at least pass a first reading under the current political mandate.

Yours sincerely,

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About the European Society of Endocrinology

The European Society of Endocrinology (ESE) provides a platform to develop and share leading research and best knowledge in endocrine science and medicine. By uniting and representing every part of the endocrine community, we are best placed to improve the lives of patients. Through the 51 National Societies involved with the ESE Council of Affiliated Societies (ECAS) ESE represents a community of over 20,000 European endocrinologists. We inform policy makers on health decisions at the highest level through advocacy efforts across Europe.

About the Endocrine Society

Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization dedicated to research on hormones and the clinical practice of endocrinology. Our global membership of over 18,000 includes expert researchers advancing our understanding of interference with hormonal systems by manufactured chemicals, called endocrine disrupting chemicals (EDCs).

About the European Society for Paediatric Endocrinology

The European Society for Paediatric Endocrinology (ESPE) is an international society based in Europe that promotes the highest levels of clinical care for infants, children and adolescents with endocrine problems throughout the world, including in less advantaged areas. Our mission is to advance excellence in paediatric endocrinology and diabetes by promoting research, education and medical practice to the benefit of child and adolescent health throughout the world.

About the European Thyroid Association

The European Thyroid Association (ETA) is a scientific organization, which aims to promote clinical and basic research and raise the standards of understanding and clinical practice in thyroid disease. The Association was founded in 1965 and has met each year since then, with the exception of the years in which the International Thyroid Congress has been held. The Annual Scientific Meeting regularly attracts more than 350 abstracts and over 900 active participants. Membership of the Association consists of honorary, ordinary, junior, corporate, corresponding and emeritus. There are over 800 members.