

**EDC-Free Europe support
to answer EC Fitness Check questionnaire on EU legislation on EDCs, by 9th March**

With its newsletter in multiple languages and on social media, the EDC-Free Europe coalition [has been encouraging people across Europe](#) to take part in the European public consultation on EU legislation on endocrine disrupting chemicals (EDCs).

The public consultation survey is presented as being “designed from the perspective of a citizen” and without assuming “previous experience or specific knowledge on regulatory risk assessment and management of endocrine disruptors”. However, members of the EDC-Free Europe coalition have reported concerns about the level of expertise required to answer certain questions, or about their misleading character.

To address these concerns, EDC-Free Europe is proposing some sample answers and guidance to help answering some of these tricky questions. For more information or support, please contact sandra@edc-free-europe.org

Information on endocrine disruptors

1) How well informed are you about endocrine disruptors?

- Very well informed
- Reasonably well informed
- Poorly informed
- Not informed at all

2) Where do you get information about endocrine disruptors from? **More than one answer is possible.**

- European Commission and EU agencies
- National authorities in your country
- Specialised scientific sources
- Education and training sources
- General news coverage
- Social media
- Other sources (please specify below)
- I do not look for information on endocrine disruptors

Other sources:

50 character(s) maximum

3) How well informed are you about the decisions made in the EU with regard to endocrine disruptors?

- Not at all, I trust regulators to make the right decisions to keep me safe
- Somewhat informed
- Very well informed
-

Don't know

- 4) Do you think that the effects of endocrine disruptors on public health and the environment are understood?
- Yes
 - Yes, to some extent
 - No
 - Don't know

Effectiveness of EU laws

5) In your opinion, to which extent do EU laws protect you from exposure to endocrine disruptors through: [See EDC-Free Europe eight demands for a European EDC Strategy \(May 2018\) and other publications on EDC-Free Europe website.](#)

	Not at all	To a small extent	To a moderate extent	Fully	Don't know
Outdoor air	<input checked="" type="radio"/>		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Drinking water (tap water)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Home or office (e.g. furnishing, flooring, paints)		<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food and beverages	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food contact materials including packaging (e.g. plastic films, pizza boxes)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detergents	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Medicines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Medical devices (e.g. prostheses, stents, bandages, dental fillings)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personal care products (e.g. cosmetics, personal hygiene)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electric and electronic equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clothes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others (please specify)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other

50 character(s) maximum **Combined exposure / cocktail effect**

- 6) In your opinion, how well do EU laws protect you from endocrine disruptors compared to other toxic chemicals (e.g. carcinogenic or mutagenic substances, substances toxic to reproduction)?
- I am less protected from endocrine disruptors

- I am protected from endocrine disruptors and other toxic chemicals to the same extent
- I am less protected from other toxic chemicals
- Don't know

7) The endocrine (hormonal) system controls a large number of processes in the body throughout life from early stages such as embryonic development and puberty, to later ones such as reproductive life and old age. Considering different life stages, in your opinion how well do EU laws protect citizens from effects of endocrine disruptors? *See report to the European Parliament Petition Committee, "Endocrine*

Disruptors: from Scientific Evidence to Human Health Protection, March 2019.

	High level of protection	Moderate level of protection	Low level of protection	Don't know
Unborn through exposure during pregnancy	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Newborn up to the age of 3	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>
Children until puberty	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>
Adolescents	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>
Pregnant women	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>
Adults in general	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>
People at work	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>
Elderly	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>
People with illnesses	<input type="radio"/>	<input type="radio"/>	X <input type="radio"/>	<input type="radio"/>

8) In your opinion, to what extent are endocrine disruptors contributing to some human diseases/health conditions such as infertility, cancer or obesity?

- Not at all
- To a small extent
- To a moderate extent
- To a large extent
- Don't know

9) In your opinion, how well does EU legislation protect the following categories of wildlife from effects of endocrine disruptors? *See European Commission web page*

https://ec.europa.eu/environment/chemicals/endocrine/definitions/affect_en.htm

	High level of protection	Moderate level of protection	Low level of protection	Don't know
Insects, including bees and other pollinators	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>

Other invertebrates, such as snails, shrimps and worms	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Fish and amphibians	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Birds and reptiles	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Mammals	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Plants	<input type="radio"/>	<input type="radio"/>	X	

A common goal of EU laws on chemicals is the protection of human health and the environment. This should be achieved through minimising exposure to hazardous chemicals. At the same time EU laws have the goal to improve the free movement of goods in the EU.

Chemicals are managed under different EU laws according to their uses. Some EU laws require specific assessment of endocrine disrupting properties of the chemicals. Others do not specifically refer to endocrine disruptors but may have links to those laws. Depending on the sector this has resulted in different approaches to endocrine disruptors. This has raised the question as to whether the EU laws are sufficiently coherent with regard to endocrine disruptors.

10) In your opinion, should the EU have the same approach across regulatory sectors (e.g. industrial chemicals, cosmetics, plant protection products, biocides, food) to:

	Yes, the same approach should be applied to all sectors	Yes, to the extent possible	No, the approach should be sector specific	Don't know
Identifying endocrine disruptors	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Managing the risks of exposure to endocrine disruptors	X		<input type="radio"/>	<input type="radio"/>

You could consider indicating in Q19 (Open question): "All EU regulations addressing people and/or environment exposure to EDCs, whatever the sector at stake, should aim at a high level of health and environment protection in conformity with EU treaty provisions, as well as the implementation of the precautionary principle and polluter-pays principle".

11) In your opinion, to which extent do EU laws allow for identification of endocrine disruptors in the following sectors? *This question and the set answers are confusing and can be interpreted in different ways. The drafting of the question refers to legislative provisions allowing for identification while the responses refer to a number of EDCs identified which is in any case very far from the reality (18 ED chemicals identified compared to a list of several hundreds of suspected EDCs. One interpretation could be that sectoral legislation (e.g. for toys, food contact material, cosmetics) allows for identification of EDC => most answers are "none are identified except for biocide. Another interpretation is EU laws in general i.e. in practice REACH, Biocides regulation and Plant*

protection products regulation allow for identification of EDCs => answers are “few are identified”.

	Endocrine disruptors are all identified	Endocrine disruptors are partially identified	Few are identified	None are identified	Don't know
Pesticides	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Biocides	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Toys	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Detergents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fertilisers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electrical and electronic equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Furnishings (home /office)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Food contact materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Food additives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Personal care products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Medical devices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Human and veterinary medicines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

12) In your opinion, to which extent do EU laws **manage the risks** to endocrine disruptors in the following sectors?

	Well managed	Fairly well managed	Not well managed	Don't know
Pesticides	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Biocides	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Toys	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Detergents	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fertilisers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Electrical and electronic equipment	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Furnishings (home/office)	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Food contact materials	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Food additives	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Personal care products	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Medical devices	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Human and veterinary medicines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X

Regulatory testing and animal welfare

EU laws on biocides and pesticides and on chemicals (REACH) require testing for endocrine disrupting properties of a substance. They also specifically ask to minimise the use of vertebrate animals (in accordance with EU laws on the protection of animals used for scientific purposes).

13) In your opinion, when testing chemicals for endocrine disrupting properties, is the animal testing minimised in the EU?

- Not at all
- Insufficiently minimised
- Minimised to the extent possible
- Fully minimized
- Don't know

Efficiency of EU laws

Benefits of EU laws include protection of human health and the environment and the free movement of goods in the EU market. Costs can be economic (time, resources) as well as ethical (e.g. use of laboratory animals for testing). Efficiency considers the benefits in relation to costs.

Regarding question #14, 15 & 16 These questions are hypothetical as for the moment there is no EU laws adequately addressing EDC exposure and the implementation of existing provisions in REACH, Biocides and Pesticides regulations is extremely limited. As a result costs & benefits as presented in this document cannot be assessed. For the moment, the costs of inaction are the biggest costs for EU citizens in general, farming community, workers exposed to EDCs, future generations and the environment. You may want to include these comments in the Open question #19.

14) In your view, are the costs (e.g. time, resources, use of laboratory animals) of the EU laws on endocrine disruptors justified and proportionate for the benefits accrued?

- Not at all
- To a small extent only
- To a moderate extent
- Fully
- Don't know

15) In your opinion, to which extent do EU laws on endocrine disruptors generate: *This question again can be misleading and can be interpreted in different ways.*

	Not al all	To a small extent only	To a moderate extent	Fully	Don't know
Costs for the agricultural sector	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>	X
Costs for the industry sector	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	
Costs for citizens		<input type="radio"/>	<input type="radio"/>		X <input type="radio"/>
Ethical costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X
Other (please specify)		<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>

Other

50 character(s) maximum *A very high cost of inaction.*

16) In your opinion, to which extent do EU laws on endocrine disruptors generate benefits for:

	Not al all	To a small extent only	To a moderate extent	Fully	Don't know
Human health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wildlife	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17) In your opinion, who should regulate to protect people and wildlife from harm caused by endocrine disruptors? (multiple answers possible)

- Local/regional authorities
- National authorities
- EU authorities
- International organisations
- There is no need to take measures
- Don't know

Relevance of EU laws

18) In which areas do you see the need for the EU to step up its efforts on endocrine disruptors?

	A lot of efforts are needed	Some efforts are needed	The efforts are sufficient	Don't know

Identification of endocrine disruptors	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coherent approach to identification and management of endocrine disruptors across regulatory sectors	<input type="radio"/> X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing exposure of humans	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing exposure of wildlife	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of burdens and costs to business	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Open question

19) Please provide any additional comment or suggestion that you consider relevant for the endocrine disruptors Fitness Check.

2000 character(s) maximum - **Feel free to take inspiration from the following text.**

EDCs are nearly everywhere, at home and in the workplace (from high-profile substances, such as the bisphenols used in the making of certain plastic bottles & can linings, restricted phthalates that are still found in one out of five toys; the flame retardants used in sofas; the pesticides ending up in our food; and the antimicrobial biocides found in cleaning products).

This illustrates the delays and inadequacies of current EU regulations which do not protect people and the environment against exposure to these harmful chemicals. Several assessments of the EU regulations on chemicals, consumer products or freshwater and a 2019 report for the European Parliament have already provided extended analysis of the regulatory gaps and set clear requests.

WHO/UNEP 2012 report “State of the Science of Endocrine Disrupting Chemicals” refers to EDCs as a “global threat that needs to be resolved”. The unanimous calls from the scientific community, EU Parliament Resolutions, EU Committee of the Regions and Council conclusions put into questions the recurrent delays of the European Commission to take action to update the 1999 EU Strategy on EDCs, amend regulations as necessary and strengthen their implementation (see The Endocrine Society, Position Statement: Endocrine Disrupting Chemicals in the European Union 1st May 2018). No further delay for EU effective action to protect people and the environment against EDCs can be justified.

We regret that this questionnaire does not address the problem of EDCs or circular economy, for which we have great concerns. The current lax legislation on chemicals and EDCs in particular will lead to reuse and extended life cycle of harmful chemicals such as EDCs, for instance in furniture, food contact materials, clothes or toys.

For further info from EDC-Free Europe coalition please see

EDC-Free Europe Eight Demands for a European EDC Strategy

<https://www.edc-free-europe.org/articles/position-paper/eight-demands-edc-strategy>

For access to Prof. B. Demeneix and Prof. R. Slama Study for the European Parliament Petition Committee, “Endocrine Disruptors: from Scientific Evidence to Human Health Protection, May 2019.

<https://www.edc-free-europe.org/articles/european-developments/report-by-eu-parliament-highlights-need-for-action-on-endocrine-disruptors>