

## Breast Cancer UK comments on the European Commission's Public Consultation on the Fitness Check Roadmap for Endocrine Disruptors

Submitted to the European Commission on 10<sup>th</sup> July 2019

Breast Cancer UK welcomes the publication of the "[Fitness Check Roadmap on endocrine disruptors](#)" and appreciates the opportunity to provide feedback to the European Commission.

Breast Cancer UK is part of the EDC-Free Europe coalition, bringing together public interest groups representing 70 environmental, health, women's and consumer groups across Europe who share a concern about hormone-disrupting chemicals (EDCs) and their impact on our health and wildlife. Our comments complement those [submitted by the EDC-Free Europe campaign](#).

### General Comments on Context and Scope

Breast Cancer UK is a charity which aims to prevent breast cancer by tackling environmental and lifestyle risk factors related to the disease, including exposures to carcinogenic and other hazardous chemicals. We are concerned about the potential role that exposures to endocrine disrupting chemicals (EDCs) play in increasing breast cancer risk<sup>1</sup>. We are especially concerned about exposures to EDCs during critical periods of human development, including *in utero*. Such exposures may affect breast tissue, making it more susceptible to breast cancer later in life, and may induce epigenetic changes leading to transgenerational effects. We are also particularly concerned about exposures to mixtures of EDCs and their potential role in increasing the risk of breast cancer and other diseases<sup>2</sup>.

We welcome the Roadmap's purpose of assessing whether EU chemicals legislation is delivering on its primary objective to protect human health and the environment through minimising exposure to endocrine disruptors. However, as documented within various Commission reports<sup>3</sup>, we believe there is already a clear understanding of the regulatory gaps contained within the EU's legislative framework. Furthermore, we believe there is sufficient scientific evidence concerning the health effects associated with EDCs for action to be taken immediately. The roadmap should reflect this. We share concerns that the fitness check may delay action that should be taken immediately to reduce citizens exposure to EDCs.

We are disappointed that the outgoing Commission has failed to both address the regulatory gaps contained within various existing pieces of EU legislation or fulfil its obligations under the [7<sup>th</sup> Environment Action Programme](#) (EAP)<sup>4</sup> to deliver specific actions which lead to the minimisation of exposure to EDCs. We believe that the EU's legal framework for regulating EDCs is not coherent and would like to see the next European strategy develop a harmonised hazard-based criteria for the identification of endocrine disruptors.

Accordingly, the Fitness check must take into account the following developments:

- [EU Environment Council Conclusions on chemicals](#)<sup>5</sup>, 26 June 2019:  
*"Environment ministers urged the Commission to ensure a high level of protection of human health and the environment by minimising exposure to endocrine disruptors, as endorsed by the 7th EAP, and by stimulating substitution by safer chemicals, as far as technically and practically*

<sup>1</sup> Breast Cancer UK (2019) 'Background Briefing: Endocrine Disrupting Chemicals', available at: [https://www.breastcanceruk.org.uk/uploads/BCUK\\_EDC\\_brief\\_v2\\_20.9.18.pdf](https://www.breastcanceruk.org.uk/uploads/BCUK_EDC_brief_v2_20.9.18.pdf) (Accessed 9<sup>th</sup> July 2019)

<sup>2</sup> Riberio, E, et al. (2017) EDCs Mixtures: A stealthy hazard for human health: Toxics, 5:5. available at: <https://www.mdpi.com/2305-6304/5/1/5/htm> (Accessed 9<sup>th</sup> July 2019)

<sup>3</sup> European Environment Agency (2012) 'The impacts of endocrine disruptors on wildlife, people and their environments' available at: <https://www.eea.europa.eu/publications/the-impacts-of-endocrine-disruptors> (Accessed 9<sup>th</sup> July 2019)

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013D1386>

<sup>5</sup> European Council (2019) 'Council conclusions on chemicals' available at: <https://www.consilium.europa.eu/en/press/press-releases/2019/06/26/council-conclusions-on-chemicals/> (Accessed 9<sup>th</sup> July 2019)

*possible, and to provide, without undue delay, an action plan with clear and concrete measures and an ambitious timeline for doing so”.*

- [European Parliament resolution on endocrine disruptors](#)<sup>6</sup>, 18<sup>th</sup> April 2019:  
*“MEPS’ called on the Commission to swiftly take all necessary action to ensure a high level of protection of human health and the environment against EDCs by effectively minimising overall exposure of humans and the environment to EDCs”.*
- [European Parliament Study: “Endocrine Disruptors”: from Scientific Evidence to Human Health Protection](#)<sup>7</sup>, March 2019:  
*The fitness check should take into consideration the analysis and conclusions of this report.*

We, alongside our EDC-Free partners, were disappointed with the Commission’s Communication [“Towards a comprehensive EU framework on endocrine disruptors”](#)<sup>8</sup> as it failed to provide any specific measures, timelines, targets or action plans that would form a coherent EDC strategy. For more information, the EDC-Free network published a collective statement<sup>9</sup> which identifies eight elements that should be included in an EU Strategy on EDCs.

Following the number of fitness checks that have taken place over recent years it is vital that this EDC fitness check assesses how to strengthen protections against EDCs through improved and/or new EU regulations to ensure high level of protection of human health and the environment. Additionally, any future provisions on EDCs, must be fit for purpose, support the development of a clean circular economy and guarantee the creation of a non-toxic environment.

### Specific Comments

- **Identification of EDCs:** The fitness check must build on the present approach to hazard identification and address the lack of horizontal definition for EDCs across EU regulations.
- **Suspected EDCs:** must be taken into account within the fitness check to ensure coherence with the EU’s regulatory approach to carcinogens, mutagens and reprotoxic substances.
- **Legislative gaps:** The fitness check’s focus on legislation that does not contain specific provisions for EDCs such as legislation on toys, cosmetics, and food contact materials is welcome. The fitness check should also investigate how a coherent legal framework to protect human health against EDCs in everyday consumer products can be achieved.
- **Vulnerable Groups:** the focus of the fitness check on the protection of vulnerable groups that are sensitive to EDCs (i.e. the foetus or adolescents) is welcome. However, it should also pay particular attention to young workers, pregnant and breastfeeding women and consider what ambitious thresholds are necessary to provide these groups with special protections.
- **Cosmetics:** The fitness check must give attention to the shortcomings of the recent review of the Cosmetics regulation<sup>10</sup> when assessing whether these regulations are fit for purpose.

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<sup>6</sup> European Parliament (2019) ‘Motion For A Resolution’ available at: [http://www.europarl.europa.eu/doceo/document/B-8-2019-0241\\_EN.html](http://www.europarl.europa.eu/doceo/document/B-8-2019-0241_EN.html) (Accessed 9<sup>th</sup> July 2019)

<sup>7</sup> European Parliament (2019) ‘Endocrine Disruptors: from Scientific Evidence to Human Health Protection’ available at: [http://www.europarl.europa.eu/RegData/etudes/STUD/2019/608866/IPOL\\_STU\(2019\)608866\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2019/608866/IPOL_STU(2019)608866_EN.pdf) (Accessed 9<sup>th</sup> July 2019)

<sup>8</sup> European Commission (2018) ‘Endocrine disruptors: a strategy for the future that protects EU citizens and the environment’ available at: [http://europa.eu/rapid/press-release\\_IP-18-6287\\_en.htm](http://europa.eu/rapid/press-release_IP-18-6287_en.htm) (Accessed 9<sup>th</sup> July 2019)

<sup>9</sup> EDC-Free Europe (2018) ‘Our eight demands for an European EDC Strategy’ available at: <https://www.edc-free-europe.org/articles/position-paper/eight-demands-edc-strategy> (Accessed 9<sup>th</sup> July 2019)

<sup>10</sup> European Commission (2018) ‘Review of Regulation (EC) No 1223/2009 of the European Parliament and of the Council on cosmetic products with regard to substances with endocrine-disrupting properties’ available at: <http://ec.europa.eu/transparency/regdoc/rep/1/2018/EN/COM-2018-739-F1-EN-MAIN-PART-1.PDF> (Accessed 9<sup>th</sup> July 2019)