

Dr Thérèse Coffey MP
Parliamentary Under-Secretary of State
DEFRA
Nobel House
17 Smith Square
London
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15 November 2016

Dear Minister,

The EU Standing Committee on Plants, Animals, Food and Feed on Friday 18th November, will discuss a revised version of the EU Commission's proposed criteria for identifying endocrine disrupting chemicals (EDCs). Breast Cancer UK is concerned that, despite revisions, the proposed criteria will still fail to adequately protect public health.

Over 1300 scientific studies link EDC exposures to increasing rates of hormone-related cancers, including breast cancer, fertility problems, diabetes, obesity and behavioural problems in children.¹ Breast Cancer UK is especially concerned that breast cancer rates in the UK and elsewhere continue to increase and EDC exposures may be partly responsible.

We see two major problems with the Commission's proposed criteria:

- 1) The revised proposal continues to impose an unreasonably high burden of proof to identify EDCs. The Commission proposes to identify EDCs only if they are "shown to cause an adverse effect" relevant to human health or non-target organisms. Demanding such high burden of proof weakens the current law, which includes regulation of substances that "may" cause harm. It also means that there will almost certainly have to be harm to humans or the environment before a chemical can be identified as an EDC.
- 2) The Commission proposes widening the current exemption for those pesticides identified as EDCs, introducing a major loophole. The proposal to change 'negligible exposure' to 'negligible risk', would mean continued exposure to these EDCs. The Commission has gone beyond their identification task and weakened the law by reintroducing specific risk assessments for pesticides identified as EDCs.

Breast Cancer UK would like the proposed criteria for identifying EDCs to change from "shown" to cause an adverse health effect to "may" cause an adverse health effect, and to include three categories of EDCs (known, suspected, potential), and specify that a substance can only be approved if exposure (not risk) is negligible.

For more in depth information on the revised criteria, and the changes that we would like to see, please refer to the Health and Environment Alliance technical briefing sent with this letter.

EDCs are a threat to our society's public health and prosperity. On behalf of Breast Cancer UK, I ask that UK representatives on the Standing Committee call for significant changes to the proposed criteria, to protect the health of EU citizens.

Yours sincerely,



Lynn Ladbrook
Chief Executive

¹ Gore et al. (2015) *Executive Summary to EDC-2: The Endocrine Society's Second Scientific Statement on Endocrine-Disrupting Chemicals*. *Endocrine Reviews* 36 593–602