

HEAL Comments to

“Overview Report I: A Compilation of Lists of Chemicals Recognised as Endocrine Disrupting Chemicals (EDCs) or Suggested as Potential EDCs 2016”



The Health and Environment Alliance thanks you for the opportunity to comment on the draft report by the International Panel on Chemical Pollution. Our comments are as follows:

1. This report, and in particular the listing of EDCs and potential EDCs, constitutes an important part of the implementation of the joint UNEP-WHO-OECD work plan on EDCs. The majority of States (14) requested this work at the last International Conference on Chemicals Management (ICCM4).
2. This report, when final, will also be a valuable contribution not only to developing countries and countries in transition, but also to countries in Europe because they can be used by
 - a. health groups (focused on particular diseases), who wish to follow the scientific developments on substances potentially associated with the diseases they work on.
We often receive enquires from health groups asking for lists of EDCs, potential EDCs in order to educate themselves, their members, and the entities with which they are in partnership.
 - b. companies working to identify which chemicals are used in their supply chains that may eventually be subject to regulation, or which can benefit from further examination.
 - c. academic & scientific research entities to inform selection of future research avenues
 - d. local authorities and other entities formulating green procurement criteria, or developing Agenda 21 / transition strategies.
3. We would like to emphasise that the lists used in this draft report are currently limited for several reasons:
 - REACH SVHC list is currently limited. It currently contains very few substances adopted on the basis of their endocrine disrupting properties. Because the SVHC list is under constant development, their listing of EDCs will change. Moreover, the REACH list does not contain substances which fall under other EU sectoral regulation.
 - The criteria to identify endocrine disrupting chemicals which will apply to EU Biocides and Pesticides are still under development, and it is not clear whether

those pesticides and biocides meeting the the future criteria will be listed in a single place.

4. It is therefore important to ensure that the report makes clear that its list of EDCs is not final or comprehensive. We also recommend that future reports continue to expand the lists, to ensure that the large number of yet unidentified EDCs (or EDCs not present on these lists) do not escape international oversight.
5. We strongly recommend that the following substances are inserted in the revision of this draft:
 - relevant pesticides that are mentioned in the UNEP/WHO “State of the Science of Endocrine Disrupting Chemicals” report (such as 2,4-D, Atrazine, Carbaryl, Malathion, Mancozeb, Vinclozolin, Prochloraz, Procymidone, Chlorpyrifos, Fenitrothion, and Linuron),
 - the Stockholm Convention substances (known or potential EDCs in Table 3.1, UNEP/WHO report).
6. We object to any implications that this report in any way interferes with or otherwise negatively affects current discussions on EU-US trade agreements. The SAICM process, and the associated joint UNEP-WHO-OECD work plan has been politically validated by many more countries than those involved in the current negotiations EU-US trade agreements. The undertaking of this report has independent legitimacy and should be regarded as such.

In conclusion, we support the completion of this report, with the revisions noted above, and its publication. We hope this work can be refined and updated regularly in the form of an official UNEP/WHO list.

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