



EDC FREE EUROPE

LET'S STOP HORMONE DISRUPTORS

EDC-Free Europe statement: 7 priorities to protect people and environment from harm caused by endocrine-disrupting chemicals

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Introduction

EDCs are chemicals that wreak havoc on human health and ecosystems by interfering with the normal function of natural hormones in our bodies and in wildlife. These chemicals, found in everyday products, have been linked to rising rates of cancers, diabetes, developmental disorders, and reproductive health issues. While the European Union has taken steps to improve the policy framework and further increase scientific knowledge to address EDCs over the last years, there is still a pressing need to complete the process for real improvements to happen in the everyday life of people in Europe and beyond.

With the new EU policy cycle 2024-2029, we are calling on the EU leadership to uphold its obligation to protect people and the environment from all harm caused by endocrine-disrupting chemicals. The EU regulatory framework on EDCs must reflect the latest scientific advances and deliver on the urgent need to minimise and, ultimately, eliminate exposure.

This is a unique opportunity to enhance the European Green Deal's role in disease prevention and reduce the rising costs of EDC-related illnesses, which were estimated at €163 billion annually for Europe back in 2016. Notably, this figure only accounts for a fraction of all EDC-related diseases¹, and only for a limited known number of EDCs, meaning addressing EDC exposure is very urgent, as the actual costs could be significantly higher.

This urgency is further reinforced by the UN Human Rights Council's 2021 recognition of the "human right to a clean, healthy and sustainable environment"², reaffirmed by the UN General Assembly in 2022. Special Rapporteurs David R. Boyd and Marcos Orellana stressed that "from a human rights perspective, achieving a non-toxic environment is a legally binding obligation rather than a policy option".³ Notably, states have a duty to prevent exposure to hazardous chemicals. As for the situation of children, who are

¹ Trasande L, Zoeller RT, Hass U, Kortenkamp A, Grandjean P, Myers JP, DiGangi J, Hunt PM, Rudel R, Sathyanarayana S, Bellanger M, Hauser R, Legler J, Skakkebaek NE, Heindel JJ. Burden of disease and costs of exposure to endocrine disrupting chemicals in the European Union: an updated analysis. *Andrology*. 2016 Jul;4(4):565-72. doi: 10.1111/andr.12178. Epub 2016 Mar 22. PMID: 27003928; PMCID: PMC5244983.

² See [g2128950.pdf \(un.org\)](#).

³ See [g2200448.pdf \(un.org\)](#), p. 11.

particularly vulnerable to chemicals exposure, the UN Convention on the Rights of the Child (UNCRC) outlines universal children’s rights for all states to respect and uphold, including the right to health and bodily integrity.⁴

This updated EDC-Free Europe statement⁵ outlines the key elements necessary to drive further progress in strengthening the European regulatory framework and to ensure a high level of protection for health and the environment from exposure to EDCs. These priorities are also key prerequisites for a clean, resilient and competitive circular economy.

Impacts from EDCs: The case for urgent EU action

EDCs are hazardous substances that interfere with any aspect of hormone action and increase people's risk of developing serious and potentially life-threatening diseases and health disorders as highlighted by experts from the World Health Organization (WHO)⁶, scientists from the Endocrine Society⁷ and others. Impacts from EDCs have been linked to reproductive and fertility problems such as drastically falling sperm rates, early puberty and hormone-dependent cancers, like breast and prostate cancers. Neurological impairments, including autism and IQ loss, metabolic changes, including obesity and diabetes⁸, have also been associated with exposures to EDCs. In wildlife, there is further evidence of reproductive and developmental harm linked to impairments in endocrine function in several species. Notably, EDCs have been associated with changes in immunity and behaviour, as well as skeletal deformities.⁹

Growing evidence shows that children, women, and pregnant women are especially vulnerable to the health impacts of endocrine disruptors, even at low doses, with effects potentially emerging decades later or in future generations.^{10 11 12 13} Human biomonitoring in Europe, including urine, hair and blood samples, reveals significant internal pollution, with the European Human Biomonitoring Initiative (HBM4EU) showing that people are exposed to multiple chemicals, including EDCs.

⁴ See [Convention on the Rights of the Child | UNICEF](#).

⁵ This EDC-Free Europe statement builds on and complements the demands outlined in the EDC-Free Europe’s “[Eight demands for an EU EDC Free Strategy \(2018\)](#)” and the “[EDC-Free Europe’s key recommendations for a reformed European regulatory framework on disrupting chemicals \(2020\)](#)”

⁶ WHO/UNEP, “WHO | State of the Science of Endocrine Disrupting Chemicals - 2012,” WHO (World Health Organization, 2013), <http://www.who.int/ceh/publications/endocrine/en/>

⁷ Endocrine Scientific Statement (review), 2015: <https://www.ncbi.nlm.nih.gov/pubmed/26544531>

⁸ Gore, A.C., La Merrill, M.A., Patisaul, H.B., and Sargis, R. Endocrine Disrupting Chemicals: Threats to Human Health. The Endocrine Society and IPEN. February 2024.

⁹ EEA Report: The impacts of endocrine disruptors on wildlife, people and their environments <https://www.eea.europa.eu/publications/the-impacts-of-endocrine-disrupters>.

¹⁰ <http://freiaproject.eu/wp/>

¹¹ Teyssere R, Brochard P, Sentilhes L, Delva F. Identification and Prioritization of Environmental Reproductive Hazards: A First Step in Establishing Environmental Perinatal Care. International Journal of Environmental Research and Public Health 2019, Vol 16, Page 366. 2019;16(3):366.doi:10.3390/IJERPH16030366

¹² Karwacka A, Zamkowska D, Radwan M, Jurewicz J. Exposure to modern, widespread environmental endocrine disrupting chemicals and their effect on the reproductive potential of women: an overview of current epidemiological evidence. Hum Fertil. 2019;22(1):2-25. doi:10.1080/14647273.2017.1358828

¹³ Green MP, Harvey AJ, Finger BJ, Tarulli GA. Endocrine disrupting chemicals: Impacts on human fertility and fecundity during the peri-conception period. Environ Res. 2021;194:110694. doi:10.1016/J.ENVRES.2020.110694

It is important to note that EDCs do not behave like most other chemicals¹⁴, meaning that specific adjustments of current regulations are required. Endocrine Society stresses that even at very low doses, EDCs can have a significant impact, and effects at low doses cannot be predicted from higher-dose studies.¹⁵

Avoiding EDCs is not an individual choice that a person can make, as these harmful substances are pervasive in our environment and can exert harmful effects at low doses, often beyond our control. Urgent political action is essential to protect public health and the environment from synthetic hormone disruptors.

Delivering on the commitments: towards a cleaner and healthier Europe

The new EU leaders can build on some progress, however, much work remains to be accomplished. In 2020, the European Commission launched the Chemicals Strategy for Sustainability (CSS) as part of the European Green Deal. The initiative, endorsed by all EU member states in the Environment Council, set out an ambitious long-term vision for the EU to tackle chemical pollution and protect European citizens and future generations by addressing hazardous chemicals, including EDCs. A key milestone of the CSS is the introduction of new hazard classes for EDCs under the revised Classification, Labelling, and Packaging (CLP) regulation. The EDC-Free Europe campaign has long called for this reform to align with scientific evidence on the widespread impact of EDCs in daily life.

Nonetheless, four years on, progress on many other key initiatives remains limited. While the revision of the regulation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) has been announced among the priorities of the EU mandate 2019-2024, the European Commission has yet to fulfil its concrete commitments under the CSS. The Union's flagship framework for industrial chemicals, REACH, remains inadequate to address the threats posed by EDCs. Political inaction has left critical gaps, such as the lack of requirements for manufacturers of chemical substances to identify their endocrine-disrupting properties - a crucial step for improving risk management.

Similarly, the commitment to phase out the use of synthetic pesticides, part of the Farm to Fork Strategy - a ten-year plan to shape a fairer, healthier, and more environmentally friendly food system launched in 2020 as part of the European Green Deal - has not taken off and must be fully reflected in the future Vision for Agriculture and Food. The rejection of the Sustainable Use of Pesticides Regulation (SUR) has significantly compromised the urgent reforms envisioned by this Strategy. This development discounts the wide public desire for a shift towards more sustainable farming methods, as shown by the 1.1 million signatures from EU citizens for the Save Bees and Farmers European Citizens' Initiative (ECI).¹⁶

¹⁴ Gore, A.C., La Merrill, M.A., Patisaul, H.B., and Sargis, R. Endocrine Disrupting Chemicals: Threats to Human Health. The Endocrine Society and IPEN. February 2024.

¹⁵ Endocrine Society (2023) Endocrine-disrupting chemicals in the European Union: <https://www.endocrine.org/-/media/endocrine/files/advocacy/society-letters/endocrine-disrupting-chemicals-in-the-european-union-jan-2023.pdf>

¹⁶ See <https://www.savebeesandfarmers.eu/eng>

A robust EU regulatory framework is crucial to ensure equal protection for all EU citizens and prevent trade barriers. While waiting for the EU to fix the regulatory gaps, some countries, such as France¹⁷, Sweden¹⁸, Denmark¹⁹ and Belgium²⁰ have taken a lead and implemented some precautionary and informative actions on EDCs.

Considering the extensive evidence and urgent need, EDC-Free Europe has identified seven prerequisites to effectively protect health and the environment against EDCs.

¹⁷ French national action plan <https://www.ecologique-solidaire.gouv.fr/rapport-devaluation-du-plan-national-daction-surperturbateurs-endocriniens-gouvernement-engage>

¹⁸ Swedish Action plan for a toxic-free everyday environment 2015–2020 states it will develop an EDC national action plan https://www.kemi.se/en/about-us/our-work/action-plan-for-a-toxic-free-everydayenvironment?_t_id=1B2M2Y8AsgTpgAmY7PhCfg%3d%3d&_t_q=Non+toxic+strategy+plan&_t_tags=language%3aen%2csiteid%3a007c9c4c-b88f-48f7-bbdc5e78eb262090&_t_ip=88.202.72.145&_t_hit.id=KemI_Web_Models_Pages_ArticlePage/_cb2842eb-7e3f-4ea8-8a4e2a37d1aa9cef_en&_t_hit.pos=10

¹⁹ Danish report towards a non-toxic future includes EDCs as a priority http://en.mfv.dk/fileadmin/user_upload/ENGLISH_FVM.DK/Focus_on/Chemicals_and_waste/13215_MF_Kemikonference_Rapport_A4_PRINT.pdf

²⁰<https://www.health.belgium.be/en/protect-yourself-and-your-baby-endocrine-disruptors#:~:text=Europe%20and%20Belgium%20are%20taking,the%20Belgian%20population%20and%20environment.>

Our key priorities:

1. Speed up identification of EDCs

The EU frameworks for identifying EDCs serve as the foundation for control and management measures in various EU regulations, but their application remains extremely limited. This slow pace is largely due to the excessive burden of proof placed on authorities. With the widespread use of these substances and the significant risks they pose to both human health and the environment, the identification process for EDCs must become faster and more efficient.

Scientists have argued that there is no clear threshold value for EDCs, in particular for exposure during sensitive periods of development and because the potency for different endpoints varies depending on hormonal systems and other factors. The uncertainties around setting thresholds with sufficient reliability has also been recognised by the European Commission's Joint Research Centre.^{21 22}

At the time of writing, fewer than 40 chemical substances or groups of substances are strictly regulated at the EU level for their endocrine disrupting properties:

- Only 27 substances or groups of substances have been identified as substances of very high concern (SVHC) under REACH due to their endocrine-disrupting properties.
- Only 18 pesticide substances have been identified by the European Food and Safety Authority (EFSA) as endocrine disruptors since the scientific criteria entered into force in 2018. Of these substances, ten have been banned, with seven solely due to their endocrine-disrupting properties.
- Only 8 biocidal active substances have been identified as endocrine disruptors for humans and/or the environment, since the adoption of criteria under the Biocidal Products Regulation (BPR).

In contrast, a report by the World Health Organization (WHO) points at several hundred chemicals with endocrine disrupting properties.²³ Additionally, the European Commission's impact assessment for the BPR and Plant Protection Products Regulation (PPPR) criteria revealed that 281 substances were identified as EDCs or suspected EDCs, when a selection of 600 chemical substances of different uses was²⁴

The introduction of new hazard classes for the CLP regulation, establishes two hazard categories for EDCs: known endocrine disruptors (Cat. 1) and suspected endocrine disruptors (Cat. 2), each for human health and for environment. While this system allows better reflection of the current scientific evidence, there is still a huge gap of data needed to classify according to the system, as well as a lack of sufficient test methods that cover all relevant effects. This can make it difficult to identify substances as an EDC Cat. 1. In addition, many control measures do not cover Cat. 2 EDCs.²⁵

EDC-Free Europe recommends:

- **Swift identification:** Ensure that EDCs are identified in a timely manner by effectively implementing the ED hazard classification under the CLP regulation, or, where classification under CLP would cause further delays, step up the SVHC identification process in application of REACH.

²² Munn S, Goumenou M. Thresholds for Endocrine Disruptors and Related Uncertainties. EUR 26068. Luxembourg (Luxembourg): Publications Office of the European Union; 2013. JRC83204

²³ https://wedocs.unep.org/bitstream/handle/20.500.11822/25633/EDC_report1.pdf?sequence=1&isAllowed

²⁴ https://ec.europa.eu/health/sites/health/files/endocrine_disruptors/docs/2016_impact_assessment_study_en.pdf

²⁵ https://chemtrust.org/clp_new_hazard_classes/

- **Grouping of substances:** Incentivise and prioritise identification and regulation of EDCs by groups of substances rather than the substance-by-substance approach, to speed up the risk assessment process and avoid regrettable substitutions.
- **Update requirements for information to be provided by industry:** Include and regularly update information requirements for identifying endocrine disrupting properties under REACH, and under other regulations, to be in line with the development and validation of new and more sensitive test methods for the identification of EDCs.
- **Ensuring relevant EDC expertise:** Ensure an absolute guarantee of independence, objectivity and transparency of the experts involved in the identification and evaluation of EDCs. There must be recognised expertise in the field of endocrine science²⁶ for the experts involved and no conflict of interest.²⁷

2. Accelerate regulation and phase-out of known and suspected EDCs

In line with the commitments of the CSS, the EU regulatory system needs comprehensive control measures for EDCs in all relevant legislations on chemical substances and products. This requires changes to product regulations for items like food contact articles, toys, cosmetics, and textiles, as well as sensitive products like drinking water devices. These adjustments will help ensure strict control measures are in place to consistently reduce or prevent human and environmental exposure to EDCs across all sectors and uses. Furthermore, this approach would help avoid repeated assessments of the same substance under different legislation and prevent inconsistent risk management.

Currently, while regulations on pesticides, biocides, and medical devices include provisions for regulating EDCs, they fall short of enabling systematic and effective control measures. Furthermore, these regulations only include control measures for Cat. 1 EDCs, whereas due to the lack of data on substance's endocrine disrupting properties, many substances will only be identified as Cat. 2. In addition, this legislation does not generally take the risk of mixture effects into consideration in risk assessments.

In other product regulations - such as the Cosmetics Product Regulation, the Toys Safety Directive²⁸, Food Contact Materials or the Drinking Water Directive, and regulations for workers protection - there is no explicit risk management regime to deal with a substance identified as an EDC. These sectoral differences lead to repeated assessments of the same substance and often inconsistent risk management.

EDC-Free Europe recommends:

Implement existing legislation in line with CSS commitments:

- **Safeguard health and precaution:** Put public health at the centre of the EU regulatory framework and ensure effective implementation of the precautionary principle in decision-making considering different gender perspectives.
- **Accelerate EDCs phase-out:** Swiftly adopt all restrictions outlined in the REACH restriction roadmap²⁹ and prohibit all additional uses of EDCs in consumer products, products used by professionals and in industry. Derogations should be granted only for time-limited "essential uses" while ensuring that exposure to EDCs is prevented and minimised whenever possible.

²⁶ <https://www.ehn.org/european-parliament-endocrine-disruptors-2646227143.html>

²⁷ PAN-Europe <https://www.pan-europe.info/press-releases/2018/12/conflict-interestpresident-juncker%E2%80%99s-science-advisors-system>

²⁸ See <https://www.edc-free-europe.org/articles/press-releases/european-parliament-votes-to-better-protect-children-s-health-against-endocrine-disruptors-through-updated-toy-safety-regulation>

²⁹ See document CA_30_2024, [Helpdesk kontaktieren \(europa.eu\)](#)

- **No EDCs in pesticide and biocide products:** Ban EDCs used as active substances and co-formulants in pesticide and biocidal products in line with the hazard-based approach of the BPR and PPPR and eliminate the exposure to suspected EDC (implementation of the substitution principle and Integrated Pest Management) in line with the ECI demands.³⁰
- **Update current PPPR and BPR** to include provisions for suspected EDCs.
- **Support safer alternatives:** Provide support for the development of safer alternatives, while ensuring industry bears the cost of their development.
- **Full transparency of assessments:** Ensure full transparency of EDC assessments undertaken in the framework of existing legislation, to facilitate informed choices and substitution.
- **Ban the production and export** of restricted and banned EDCs, and products containing EDCs.

Leverage the REACH reform to strengthen protection against EDCs:

- **Recognise EDCs as SVHCs:** Explicitly introduce EDCs as a category of substances of very high concern under REACH and automatically identify substances classified as EDCs under CLP as SVHCs under REACH.
- **Update information requirements under REACH annexes** to generate the data basis allowing for effective action on EDCs, such as (harmonised) classification under the CLP regulation and strict controls under sectoral legislation.
- **Introduce a mixture assessment factor (MAF)** into chemical assessments under REACH, PPPR and other relevant legislation to address the combined exposure and to protect against the effects from co-exposure to chemical substances.
- **Extend GRA to EDCs:** Extend the mechanism allowing for the restriction of substances or uses based on generic risk considerations (GRA) to facilitate faster phase-out of EDCs in consumer goods and other critical uses.

Deliver an ambitious revision of consumer product legislation:

- **No exemptions for EDCs:** No derogation should be granted for the use of EDCs in consumer products such as toys and childcare articles, textiles, food contact materials, and cosmetics.
- **Ensure EDC-free food:** Ensure residues of endocrine disrupting pesticides in food are banned, including in imported products.

3. Move towards an EDC-free circular economy and a non-toxic environment through better chemical transparency and traceability

The transition to a clean and resilient circular economy is dependent on the fitness of products and materials to be kept in the loop of use, re-use and repair as long as possible and on the capability of service providers to fully dismantle a product at end-of-life and select the right value-preserving recycling process for each component. To that end, full understanding of the chemical composition is crucial for safe recycling, to ensure toxic chemicals are not recirculated in new products.

Today, there is, however, a blatant lack of knowledge and understanding of chemicals used in production processes and present in products, especially products considered as “articles” in terms of REACH. Likewise, both legacy and new substances of concern continue to contaminate material cycles, slowing

³⁰ See <https://www.savebeesandfarmers.eu/eng>

down the progress towards a toxic-free circular economy.³¹ The Ecodesign for Sustainable Products Regulation (ESPR), which entered into force in July 2024, offers opportunities by introducing new tools to tackle chemicals in products and production processes.

EDC-Free Europe recommends:

- **Ban harmful chemicals and ensure substance tracking:** Ensure ESPR delegated acts for specific product groups ban most harmful chemicals, including EDCs.
- **Comprehensive tracking of substance information:** Ensure the commitments of the ESPR, Packaging and Packaging Waste Regulation (PPWR) and other relevant legislations for the digital product passport are upheld as planned and effectively allow tracking information about the substances of concern, including EDCs contained in the products covered by these regulations.
- **Right to know:** Ensure the right to know for all by making all information on chemicals in articles, including via product passports, public and easily accessible.
- **Enhance the database for information on substances of concern in articles or in products (SCIP database)**³² by including product identifiers and interfaces with e.g. consumer apps.

4. Enhance scientific knowledge of the health and environmental effects of exposure to EDCs

During the last 25 years, important EU research projects have been launched to investigate the effects of EDCs, the extent of the contamination and support improvements to regulatory measures. Important progress has been made but some key knowledge gaps still need to be addressed. In recent years, research focus has been on elements relevant to regulatory intervention, the identification of endocrine disruptors and estimation of actual exposures. Therefore, projects in the EURION cluster³³ (2019-2024), have focused on developing new methods to identify chemicals' endocrine-disrupting properties, which is a prerequisite for introducing regulatory measures.

We already know that European citizens and the environment are exposed to a wide range of endocrine disrupting chemicals on a daily basis. The Human Biomonitoring Project HBM4EU (2017-2021), covering 25 EU countries, showed that the European population is widely exposed to known endocrine disruptors, and for some sensitive groups in amounts exceeding assumed safe levels.³⁴

The EURION projects provide an opportunity to use their findings for regulatory measures, particularly to determine the level of evidence needed for integrating New Approach Methodologies (NAMs) into the regulatory framework without compromising current safety standards. Likewise, the findings from

³¹ Toxic-free Pledge:

<https://eeb.org/toxicfreepledge/#:~:text=As%20we%20look%20towards%20the,chemicals%2C%20products%2C%20and%20practices>

³² SCIP is the database containing information on substances of concern contained in articles (Substances of Concern In articles) as such or in complex objects (Products); it is established in application of the Waste Framework Directive.

³³ EURION was a cluster group of eight research projects from the Call SC1-BHC-27-2018 - New testing and screening methods to identify endocrine disrupting chemicals (EDCs), part of the European Commission's Horizon 2020 Research and Innovation Programme. Each project in the cluster focused on a different aspect of new testing and screening methods identifying EDCs. Forming this cluster group will optimise synergies and avoid overlaps between the projects to maximize impact. See more information at: <https://eurion-cluster.eu/about/cluster-overview/>

³⁴ Loh MM, Schmidt P, Christopher de Vries Y, Vogel N, Kolossa-Gehring M, Vlaanderen J, Lebret E, Luijten M. Toxicity Weighting for Human Biomonitoring Mixture Risk Assessment: A Proof of Concept. *Toxics*. 2023; 11(5):408. <https://doi.org/10.3390/toxics11050408>

HBM4EU should be utilised to prioritise regulatory actions against specific chemicals or groups of chemicals.

EDC-Free Europe recommends:

- **Use EURION results in science to policy:** Ensure that the results of the EURION projects will be transferred to the regulatory system, where possible.
- **Integrate NAMs to accelerate regulatory decision making & increase the level of protection:** Build on the outcome of EURION and ensure that new approach methods (NAMs) are integrated into the regulatory system, increasing rather than compromising the level of safety.
- **Acting on biomonitoring data in decisions:** Ensure that biomonitoring data are gender-disaggregated and intersectional, and used to prevent future exposures and improve chemicals control and for prioritisation of regulatory interventions.
- **Integrate early warning signals in chemicals assessment reform:** Adopt an ambitious ‘one substance once assessment’ package, to speed up data sharing and identification of early warning signals, with a focus on new and emerging substances.

5. Enhance public awareness of EDCs in line with EU’s work on protecting citizens’ health

According to a 2024 Eurobarometer survey, 4 in 5 citizens are worried about the impact of harmful chemicals in everyday products on both their health and the environment.³⁵ When it comes to EDCs, awareness and concerns vary across countries.³⁶

This issue is particularly urgent for pregnant women, one of the most vulnerable groups. Keeping them informed about the risks of EDC exposure is critical for safeguarding both maternal and foetal health. Medical professionals routinely offer advice to expecting mothers and future parents, yet information on EDCs is often overlooked in these conversations.³⁷ This gap is especially concerning, given that prenatal exposure has the potential to negatively affect a newborn's development and elevate the risk of chronic diseases and other health issues later in life, as discussed above.

While raising awareness and empowering citizens is essential, it must not shift the responsibility of avoiding exposure to harmful chemicals onto individuals. Achieving systemic changes requires a comprehensive and revitalised EU chemicals policy, as previously discussed.

EDC-Free Europe recommends:

- **Evidence-based campaigns to educate the public on EDCs:** Initiate public awareness campaigns led by health authorities and civil society organisations to inform the general population about exposure pathways and health risks associated with EDCs.

³⁵ See <https://europa.eu/eurobarometer/surveys/detail/3173>

³⁶ Lenters, V.C., Sugeng, E.J. and van Duursen, M.B.M. Safeguarding women’s health against endocrine disrupting chemicals: Paving the way to successful health strategies. Vrije Universiteit Amsterdam. June 2024.

³⁷ Rouillon S, Deshayes-Morgand C, Enjalbert L, Rabouan S, Hardouin JB; Group DisProSE; Migeot V, Albouy-Llaty M. Endocrine Disruptors and Pregnancy: Knowledge, Attitudes and Prevention Behaviors of French Women. Int J Environ Res Public Health. 2017 Sep 6;14(9):1021. doi: 10.3390/ijerph14091021. PMID: 28878198; PMCID: PMC5615558.

- **Targeted information for vulnerable populations:** Provide specific information and actionable steps to mitigate EDC exposure for segments of the population that are particularly vulnerable.
- **Health sector awareness:** Increase awareness within the health sector by providing information and training materials for medical, health and education professionals and multiplier groups so that they can advise the public on reducing their exposure.

6. Bolster EU leadership in the international chemical governance

The need for the EU to enhance international policies and obligations and assume a leadership role is underscored by the current lack of control measures on EDCs globally and in countries worldwide, especially in the Global South. Global markets and supply chains must prioritize and promote the protection of healthy environments for the benefit of all. In addition, the EU must keep the promise of the CSS to stop the production of banned substances for export to non-EU countries and reduce waste export.

EDC-Free Europe recommends:

- **GHS ED hazard class:** EU member states and the European Commission should advocate for the inclusion of endocrine disruptor hazard classes in the Globally Harmonized System (GHS) to ensure consistent global criteria.
- **Ambitious Global Plastics Treaty:** EU member states and the European Commission should push for ambitious chemical restrictions and bans as well as for transparency and traceability of chemical in materials and products within the framework of the Global Plastics Treaty to protect human health and the environment.
- **Keep EDCs as Issue of Concern in the Global Framework on Chemicals:** EU member states and the European Commission must ensure that EDCs are recognized as an Issue of Concern in the new Global Framework on Chemicals (GFC), with a robust work program and adequate funding to address their impacts.
- **More EDCs in the Stockholm Convention:** EU member states and the European Commission should advocate for the inclusion of additional persistent organic pollutants (POPs) with endocrine disrupting properties in the Stockholm Convention. In addition, they should work towards requiring disclosure in products to enhance consumer safety.
- **Support international chemical policy processes:** EU member states and the European Commission need to actively support and advance the implementation of all international policy processes related to chemicals and waste, by initiating progressive change, providing sustainable funding and safeguarding the space for civil society organisations and rights holders.
- **Stop double standards in substance export:** The EU must cease the practice of exporting banned substances and products to non-EU countries to prevent environmental and health hazards abroad.
- **Stop waste exports:** The EU should halt all waste exports to non-EU countries, particularly plastic waste and textiles, to ensure responsible waste management and protect global ecosystems.

7. Strengthen access to justice and accountability

Exposure to chemicals such as EDCs pollutes the environment, damages ecosystems and affects human health. Scientific findings referred to above show that the detection of chemicals in blood and urine are signals for severe health constraints and diseases which may occur at a later stage.

Therefore, in line with the human right to a non-toxic environment and learning from good practices of other EU legal frameworks apart from chemicals, the legal system must provide those exposed to EDCs with effective access to justice tools.

Companies whose products and production processes are responsible for exposure must be held accountable - not least to prevent the costs of disease and pollution from being passed on to society.³⁸ In addition, authorities should be obliged to scrutinise all evidence of chemical exposure submitted by citizens and their representatives, and to take regulatory or enforcement action, where appropriate.³⁹

EDC-free Europe recommends:

- **Establish a right to trigger action from authorities**, for example as part of the 'one substance one assessment', or as part of the REACH reform.⁴⁰
- **Establish the right to require action** such as injunctive relief and compensation from companies, for example, where industrial chemicals are concerned, as part of the REACH reform.⁴¹
- **Harmonise sanction regimes:** Make sure sanction regimes linked to chemicals legislation are harmonised across the EU, effective and deterrent.⁴²

EDC-Free Europe is a coalition of public interest groups representing more than 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. Campaign partners include trade unions, consumers, public health and healthcare professionals, advocates for cancer prevention, environmentalists and women's groups.

The EDC-Free Europe secretariat is hosted by the Health and Environment Alliance (HEAL). HEAL's EU transparency register number: 00723343929-96

³⁸ Good practices can be found in the Antitrust Damages Action Directive, the Industrial Emissions Directive and the Ambient Air Quality Directive.

³⁹ Good practices can be found in Regulation on deforestation commodities, Timber Regulation, Consumer Protection Cooperation Regulation, Directive on the protection of whistle-blowers.

⁴⁰ Cf. For the REACH context [Demand #6 for REACH reform: Access to justice | ClientEarth](#).

⁴¹ Cf. For the REACH context [Demand #6 for REACH reform: Access to justice | ClientEarth](#).

⁴² Cf. For the REACH context [Demand #5 for REACH reform: Sanctions & control | ClientEarth](#).