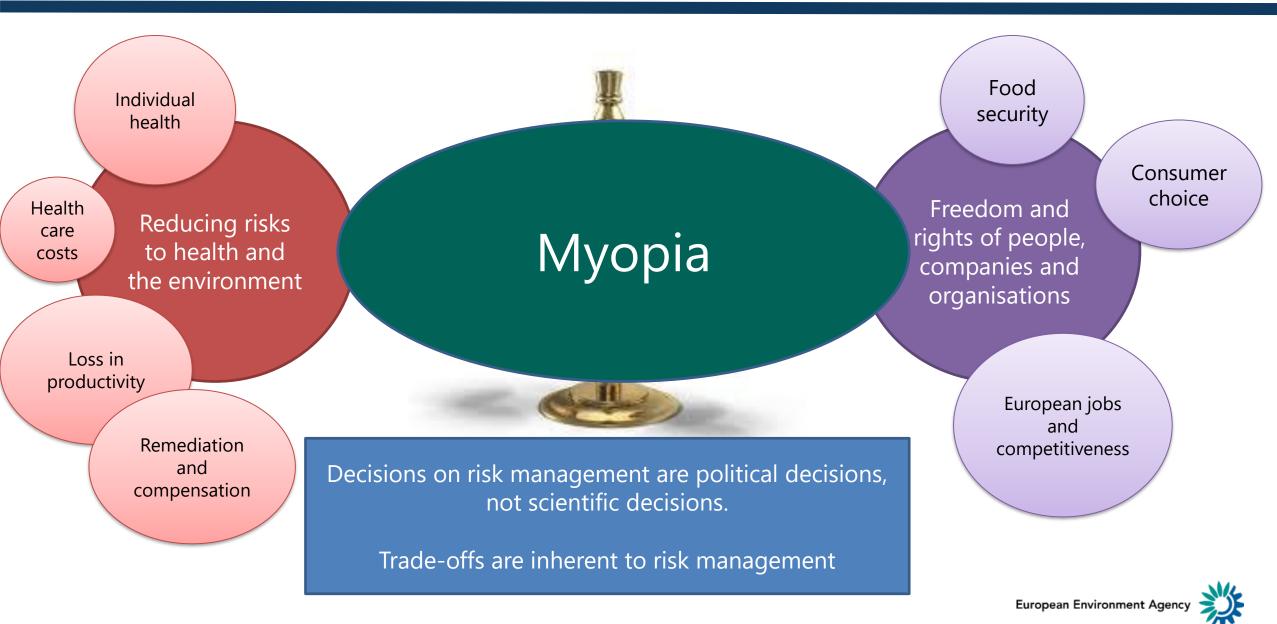
Managing the risks of endocrine disruptors

Symposium on endocrine disrupting chemicals Mutualités Libres

Risk management presents a dilemma



What is our level of ambition in managing risk?

A high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities.



Treaty of the European Union, 2012, Article 168



What is our level of ambition in managing risk?



Union policy on the environment...shall be based on the **precautionary principle**.

Relevant where there are reasonable grounds for concern that the potentially dangerous effects on the environment, human, animal or plant health may be inconsistent with the high level of protection chosen for the Community.

Communication from the Commission on the precautionary principle

Factors triggering the precautionary principle

- 1. Identification of potentially negative effects
- 2. Scientific evaluation demonstrates risk
- 3. Scientific uncertainty can be reduced by
 - Reliance on animal models
 - Inter-species comparisons
 - Safety factors
 - No acceptable intake
 - As low as reasonable achieved

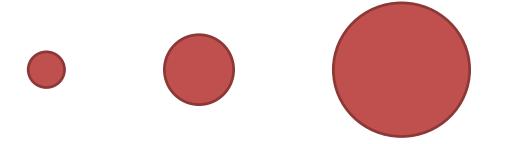
Lessons from case studies of risk management

Early warnings of risk to health were not acted upon

Early action could have prevented harm

Costs of action were overestimated

Harm tends to expand as knowledge grows





EEA, 2001, Late lessons from early warnings: the precautionary principle 1896-2000

EEA, 2013, Late lessons from early warnings: science, precaution and innovation



Distribution of costs and benefits

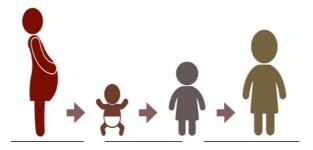
Costs and benefits are unequally distributed

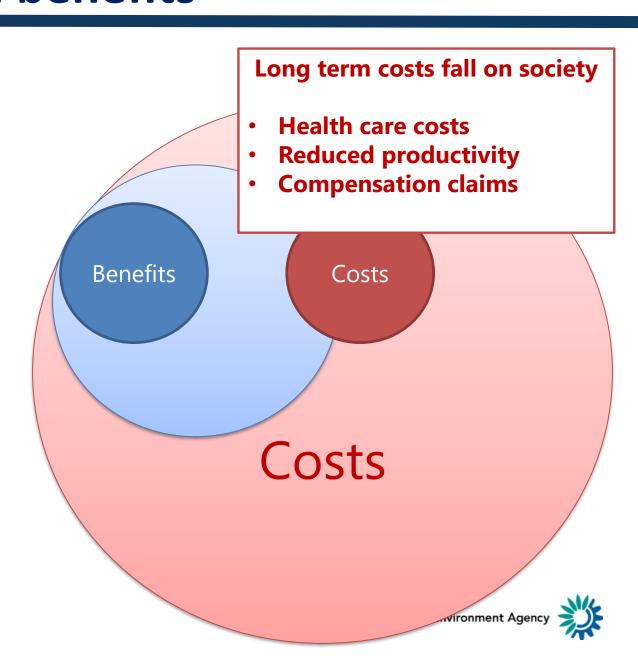
Benefits are concentrated

Costs fall on vulnerable groups









Overestimating costs of action, mis-information and stalling

Estimates of costs of action often found to be overestimates

Deliberate efforts to undermine science and introduce uncertainties and ambiguities

- Comparison with natural toxins
- "Sugar is an endocrine disruptor"
- People choose hazardous behaviours every day

Call for robust evidence of mechanistic action for each substance subject to risk management

Avoid paralysis by analysis

Avoid experimenting on the human population

Apply the precautionary principle

Regulation drives innovation

Europe is a leader on sustainable development

Standards translated to global level

Where does the burden of proof lie?

In most cases, European consumers and the associations which represent them must demonstrate the danger associated with a procedure or a product placed on the market, except for medicines, pesticides and food additives.

However, ..under the **precautionary principle**, the producer, manufacturer or importer may be required to prove the absence of danger.



No data, no market under REACH



Emerging risks in a circular economy

Workers exposure in waste recycling facilities

Consumer exposure to legacy substances in recycled materials

Transfer of chemicals to food chain via reuse of sludge and wastewaters on agricultural land

Downstream exposure cannot be predicted

Upstream controls most effective in managing risks







Protect health and environment:

- Consistent and simplified approach to endocrine disruptors across EU legislation
- Legally-binding hazard identification
- Phase-out from consumer products
- Strengthen workers protection
- Substituting substances of concern
- Tackling chemical mixtures
- Improving **public access to information**

Boost innovation and competitiveness:

- Developing criteria for safe and sustainable
 by design and providing financial support for uptake
- Enforce current rules
- Research and innovation
- Introducing "one substance one assessment"
- Strengthening "no data no market"





Thanks!

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