

WEMOS' RESPONSE TO THE EDC ROADMAP

We call on the European Commission to design a comprehensive strategy that minimizes and eventually ends the exposure of European citizens to endocrine-disrupting chemicals (EDCs).

We ingest, absorb and breathe harmful chemicals, like EDCs, on a daily basis. Endocrine-disrupting chemicals have been detected in the entire population, including pregnant women and new-born babies. Evidence on the adverse health and environmental effects of EDCs is increasing. It is clear that exposure to these chemicals violates our right to health.

A CIRCULAR ECONOMY

We applaud the Commission's intention to pursue a roadmap on EDCs. However, we are concerned about the scope of the roadmap and planned communication, as they do not entail a comprehensive approach to EDCs, particularly regarding the circular economy. While the transition to a circular economy is exciting, progress is hampered by the use of chemicals in products that have a negative effect on the environment and human health, and that hinders our recycling efforts.

STRATEGY

The comprehensive strategy on EDCs should contain the following:

- **Base the strategy on the precautionary principle.** This meets a right to health approach and is required for a well-functioning circular economy. We ask you to act in behalf of public interest, the environment and future generations and to create a truly clean and healthy environment for all.
- **Create coherent legislation to ban EDCs and to end exposure to EDCs.** This means that the lack of overlap between legislation on EDCs in food contact materials, cosmetics, toys and medical devices needs to be addressed urgently.
- **Ensure that REACH functions well, including for EDCs.** Make use of the authorization and restriction principles which REACH has to offer. Besides identification, regulation of new EDCs must be more efficient.
- **Ensure that the polluter pays for the negative effects of exposure (as this comes with high health costs).** For example by taxing the use of EDCs to encourage the use of safe alternatives.
- **Invest in research on alternatives for EDCs including non-chemical alternatives.** While chemical alternatives are needed, often it might be possible to 'think-out-of-the-box' and use a truly green alternative. This goes hand in hand with the circular economy and the EU's plastic strategy.
- **Take the latest independent peer-reviewed science into account,** including evidence on the cocktail effect and non-monotonic dose effects, which are a serious concern.

- **Include a long-term plan to monitor exposure to EDCs via biomonitoring** and to increase understanding of health effects and effective policies.

Please also read the [collective statement of the EDCfree network](#), which contains detailed propositions for an ambitious future-proof strategy on EDCs.

We hope you will take this opportunity to develop a strategy for a healthy, future-proof Europe and circular economy. With a strong strategy, we can stop exposure to EDCs for all European citizens.