



EUROPEAN COMMISSION
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

Resources Based, Manufacturing and Consumer Goods Industries
Chemicals Industry

Brussels, 1 March 2013

EL

Stakeholders meeting

Name: Eric LIEGEOIS

Service: DG ENTR/F2

Subject: Meeting BASF – Director G. Cozigou, G. Willmott, A. Giral-Roebling (ENTR F.1), E. Liégeois on Endocrine disruptors

01/03/2013 10.30-11.30 G.Cozigou's office

Meeting with [REDACTED], Vice-President EU Government Relations, [REDACTED] Senior Vice President Product Safety, [REDACTED] Senior Vice President, Global Product Safety.

The meeting concerned the recent development regarding the draft document concerning identification criteria for endocrine disruptors. The current draft of DG ENV proposes a categorisation of the EDs and the practical application of those categories will be explained in guidelines produced by JRC. The categorisation is currently based only on hazard identification and does not take into account elements of hazard characterisation such as potency (a threshold value below which the substance would not be considered as having ED properties or posing a risk).

BASF representatives reminded us that there is no risk-assessment approach in the Plant Protection Product Regulation for a substance identified as ED. The hazard-based cut-off criteria is not a science-based approach according to BASF and could seriously endanger innovation.

Although initially industry was reluctant towards categorisation, BASF admits now that this could be acceptable provided that the potency (or the STOT – Specifically Target Organ Toxicity) is included in the identification criteria.

BASF suggests that the ED identification criteria document include a provision that risk assessment should be included during the identification phase if not foreseen in the vertical regulatory framework.

The wording of category 2 shall be amended according to BASF into “substance under evaluation, category 2”. The company also announced that they will connect with DG Trade as there is an EU-US Free Trade Agreement under discussion these ED identification criteria might have major market disrupting effect for PPP and the PPP food residues regulations.