From: [redacted]@bm.com>
Sent: 19 June 2013 12:49
To: LIEGEOIS Eric (ENTR)
Subject: Comments

Eric,

Here are some comments:

- The proposed criteria for endocrine disrupters must incorporate a full hazard assessment, including both hazard identification and hazard characterisation. The two steps are connected in toxicology and must be performed together for a robust conclusion regarding the hazard of a substance. A full hazard characterisation therefore needs to be undertaken as part of the weight of evidence approach. This needs to be stated under points 4, 7, and 9. in the document to avoid confusion in terms of implementing the provisions of the Commission recommendation and developing the accompanying guidance documents.

- Industry supports the creation of one set of criteria for the identification of endocrine disruptors which will then be taken into account by the different EU regulations also incorporating a risk assessment . The proliferation of "categories" is not conducive to providing regulatory predictability to industry.
    - In the case of chemicals, there is no need for creating additional categories for the regulation of substances outside of REACH. Substances identified as endocrine disruptors which may require further evaluation can be included in the CoRAP.

- Notwithstanding the immediate above comment, considering creating a second category, at the very least all references to "suspected" should be removed. Using the term "endocrine active" or "endocrine effective" in the title contradicts the WHO definition and risks implying that an adverse effect is not required before an endocrine disruptor is identified. A second category would be better named "Substances for further evaluation (and/or testing) for endocrine mediated adverse effects".

Kind regards,

[redacted]
Burson-Marsteller
37 Square de Meeûs, B-1000 Brussels
o +32 2 [redacted] +32 [redacted] [redacted]@bm.com
www.Burson-Marsteller.com
facebook.com/Burson-Marsteller Brussels @BM Brussels
EU Transparency Register ID Number: 9155503593-86