

From: ARENA Francesca (SANCO)
Sent: 28 February 2013 19:33
To: MIKO Ladislav (SANCO); POUDELET Eric (SANCO); VALLETTA Marco (SANCO); GAUTRAIS Bruno (SANCO); GUMBEL Tim (SANCO); CUSIMANO Alain (SANCO); WALSH Michael (SANCO); GOUX Sebastien (SANCO); CIARLO Giulia (SANCO); AJOUR Agnes (SANCO); SCHAEFER Annette (SANCO); DE GAETANO Federica (SANCO); DASKALEROS Panagiotis (SANCO)
Cc: FABRIZI Laura (SANCO); FLUEH Michael (SANCO)
Subject: BTO meeting E3 pesticides/ECPA -CEFIC on endocrine disruptors 28.2.2013

Please find below a BTO prepared by Laura Fabrizi:

Participants

SANCO: F. Arena, L. Fabrizi

ECPA: 
CEFIC: 

Aim of the meeting

The meeting was requested by ECPA and CEFIC to present their views on the latest version of the criteria on ED as proposed by DG ENV, especially as regards the regulatory consequences for pesticides.

Summary

Main messages from CEFIC and ECPA:

- **Concern** about criteria presented as nearly finalized by DG ENV, when EFSA opinion has not yet issued.
- A **preliminary impact assessment** shows that 20% of all active substances could be banned with current criteria. Most importantly, they could include nearly all triazoles and dithiocarbammates, i.e. 80% of all fungicides in cereals market.
- If **triazoles in pesticides** are banned, triazoles will anyhow remain on the market as a large class of **pharmaceuticals**.
- **Amendments** to the criteria (particularly as regards **potency**) should be foreseen in the written commenting round, as no ad-hoc WG meeting is scheduled after the publication of the EFSA opinion.
- **Category 2** (suspected ED) will **stigmatize** many chemicals for which uncertain evidence exists.

Other points

- SANCO reminded that criteria will be subject to the scrutiny of the European Parliament. Substantial deviations from the original intention of legislators drafting Reg 1107/2009 (i.e. hazard based cut-off criteria) will probably be unacceptable.
- 2 of the authors of the EEA e WHO/UNEP reports (Prof Kortenkamp and prof Susan Jobling – both from Brunel University), together with few other scientists, presented their position on ED in a document titled "The Berlaymont Declaration on ED", available on PAN-Europe website.
- CEFIC and ECPA points out that the 3 reports (Kortencamp report, EEA report and WHO/UNEP report) on which DG ENV bases its proposal are actually a single report, as they are drafted by the same authors.

Francesca