

**From:** [REDACTED] (CAB-KYRIAKIDES)  
**To:** CAB KYRIAKIDES ARCHIVES; [REDACTED] (CAB-KYRIAKIDES); [REDACTED] (CAB-KYRIAKIDES)  
**Subject:** FW: Thank you from the Endocrine Society  
**Date:** jeudi 9 juillet 2020 23:18:27  
**Attachments:** [Thank You to Commissioner Kyriakides.pdf](#)  
[Endocrine Society note re no-threshold EDCs.pdf](#)  
[image002.jpg](#)

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**From:** [REDACTED]  
**Sent:** Thursday, July 9, 2020 10:59 PM  
**To:** CAB KYRIAKIDES CONTACT  
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[REDACTED] CAB-KYRIAKIDES); [REDACTED]  
**Subject:** Thank you from the Endocrine Society

Dear Commissioner Kyriakides,

On behalf of the Endocrine Society and our members I write to thank you and your colleagues for your time and attention to our presentation on endocrine-disrupting chemicals (EDCs) last week. We were grateful for the opportunity to share some of the latest science on harmful impacts of EDCs on our health and trust it will support your current policy discussions concerning further EU actions to protect citizens from exposure to EDCs. We appreciated your encouragement to hold similar meetings with other Commissioners: we had a follow-up meeting with [REDACTED] from Commissioner Sinkevicius cabinet, having seen the Commissioner last December. We will certainly now also approach Commissioner Breton.

We would like to emphasise the following points from our discussion and provide some further background on the points that we made.

### EDC Science

The Society and our member scientists and clinicians are encouraged by your emphasis on scientific evidence to support EU action. As we discussed there is a widespread EU and international scientific consensus that exposure to EDCs causes a variety of public health harms including breast cancer, thyroid disorders, and diabetes. An initial list of scientific resources on EDCs is included in annex to this letter, and we would be happy to provide additional scientific articles or other information on request.

We mentioned our concerns about certain recent editorials by individuals who claim to be EDC scientists which down-play the harm from exposure to EDCs and raise doubts about their impacts at very low doses and the need for a no-threshold approach. This view is contrary to the scientific consensus established by expert endocrine scientists and clinicians who are actively publishing original, peer-reviewed research on EDCs supporting a no-threshold approach for these chemicals<sup>[1]</sup>. I attach our briefing note on this issue with references to consensus opinions.

In the current context of the Covid-19 pandemic, you may also be interested in several new articles, written by recognized EDC experts including members of the Society, which highlight the link between exposure to EDCs and increased vulnerability to Covid-19<sup>[2][3]</sup>. We also share a recorded webinar on EDCs and Covid-19<sup>[4]</sup>.

Your insightful question about a correlation between levels of cumulative EDCs build-up and onset of cancers has no easy answer as the timing of exposure is critical, and the delay between early-life exposure and development of disease can be years or decades. There is also the possibility of mixture effects influencing breast cancer risk as has been seen with certain pesticides along with other EDCs. While additional biomonitoring studies may provide greater resolution on windows of susceptibility, the data linking early-life exposure to several classes of EDCs and increased breast cancer risk reinforces the need to be extremely cautious regarding EDCs due to sensitive windows of development where endocrine interference may have long-term effects.

### EU Regulatory Controls

In view of the clear scientific evidence of harm it is urgent that the EU takes further action to minimise citizens' exposure to EDCs. We were glad to hear that you share our ambition for the EU to create a horizontal definition and harmonized approach to the regulation of EDCs. We are extremely concerned that an EDC can be identified, shown to be hazardous and regulated in one context, and yet still permitted for use in other sectors. For example, some phthalates are banned in cosmetics but still allowed in food contact materials. Conversely, the EDC triclosan cannot be used in food contact materials and is banned as a biocide, yet it is still allowed in personal care products. Please also note that in the context of regulatory controls on EDCs, if treated as non-threshold substances they would join the existing REACH process for other non-threshold chemicals, which provides time to consider substitution and apply for exemptions for essential uses.

The current EU efforts towards an agreed definition of EDCs, based on the WHO definition, are positive, and we trust that there will be equal efforts in parallel to ensure consistent controls to reduce exposure to the various EDCs which have already been identified at the EU level. We would support a stepwise approach to prioritizing horizontal controls for those identified EDCs which are known to be more harmful to human health.

### Health Programmes

Thank you for taking up our suggestion to include control of exposure to EDCs and other chemicals as one key measure of prevention of reproductive and other cancers in the EU Cancer Plan. It was also encouraging to hear of the focus on non-communicable disease in the new EU for Health programme and we look forward to contributing to the plans for that programme in due course.

Finally, we accept with pleasure your invitation to continue collaboration on EDCs in the different EU policy contexts in the future and wish you well in the ongoing debates within the Commission on this issue. Please feel free to approach us at any point with any queries you may have by contacting [REDACTED] Science Policy at [j\[REDACTED\]@endocrine.org](mailto:j[REDACTED]@endocrine.org).

Sincerely,



[REDACTED]

[REDACTED], Endocrine Society

### POLICY RECOMMENDATIONS AND ADDITIONAL RESOURCES ON EDCS

- ◆ [Endocrine Society Scientific Statement on EDCs](#)
- ◆ [Endocrine Society Position Statement on EDCs in the European Union](#)
- ◆ [Introduction to EDCs](#), A Guide for Public Interest Organizations and Policymakers (available in multiple languages)
- ◆ [Let's Talk EDCs Video Series](#) describes EDCs, their health effects, and strategies to minimize exposure.
- ◆ [EDCs Topics Page](#) provides a more comprehensive list of resources.



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[1] <https://www.ehn.org/european-parliament-endocrine-disruptors-2646227143.html>

[2] <https://www.ehn.org/chemical-exposure-coronavirus-2645785581.html>

[3] <https://www.ehn.org/toxic-chemicals-coronavirus-2645713170.html>

[4] <https://www.healthandenvironment.org/webinars/96526>