

**From:** FLUEH Michael (SANCO)  
**Sent:** 13 June 2013 11:31  
**To:** MIKO Ladislav (SANCO); SEYCHELL Martin (SANCO); ARENA Francesca (SANCO);  
FABRIZI Laura (SANCO); POUDELET Eric (SANCO)  
**Cc:** AJOUR Agnes (SANCO); VALLETTA Marco (SANCO); GAUTRAIS Bruno (SANCO);  
GUMBEL Tim (SANCO); LECRENIER Sabine (SANCO); VANHOORDE Robert (SANCO);  
WALSH Michael (SANCO); DASKALEROS Panagiotis (SANCO); CIARLO Giulia  
(SANCO); BRUETSCHY Chantal (SANCO); GOUX Sebastien (SANCO); SCHAEFER  
Annette (SANCO)  
**Subject:** Meeting with Bayer on endocrine disruptors, 12 June 2013

Participants:

Bayer: [REDACTED] Bayer Crop Science  
[REDACTED] Bayer Material Science  
SANCO : L. Miko, M. Seychell, F. Arena, L. Fabrizi and M. Flüh

- Bayer made point to consider in the criteria factors such as threshold, irreversibility and potency . Bayer recalled WHO definition of e.d., which would require to look also at hazard characterisation.
- Bayer strongly supports to have clear criteria (one category alone!) in order to avoid uncertainty in the assessment and approval processes.
- SANCO stressed need to get data on impact in the two different scenarios (including or not elements of hazard characterization in the criteria). Impact should not be related to economic impacts for industry (which is of limited interest to general public), but should also look at potential impacts for consumer, such as increase in food prices and availability. Impact should also compare health risks linked to alternatives. Bayer asked whether COM should not consider to carry out a formal I.A., rather than to rely on industry data alone. Bayer provided two papers (ECPA and IRL) describing potential impacts for crop production. Bayer considers that consumer would be ready to accept thresholds if we convey the message that we do not intend to regulate natural endocrine disruptors such as coffee and carrots too.
- SANCO invited Bayer to approach other services in COM as well in order to explain their position and possible consequences.