From: (TRADE)

Sent: 24 October 2014 18:39

To: GARCIA BERCERO Ignacio (TRADE); (TRADE);

(TRADE); (TRADE);

(TRADE); (TRADE); (TRADE); (TRADE);

(TRADE); (TRADE)

Cc: (TRADE)
Subject: Meeting with PAN-E on EDs

Attachments: PANs position- Roadmap.pdf; PAN-Europe- Proposal IA.pdf

Dear colleagues,

Please find below the summary report of the meeting held on 21 October with the representative of PAN-E and the two PAN-E position papers on the subject.

MEETING WITH PAN-E ON EDs

Participants: (Unit G.3) / (Unit D.3)
- Pesticide Action Network Europe (PAN-E)

Summary report

and met the representative of PAN-E on 21 October 2014 to discuss the topic of endocrine disrupting substances (EDs).

explained that PAN-E is an international organisation with Divisions in each continent and they have different approaches according to the interest of their countries/regions. conveyed the message that PAN-E were very worried about the ongoing Commission Impact Assessment on EU criteria to identify EDs and in particular the potential regulatory consequences on relevant sectorial legislation such as notably the EU Plant Protection Products Regulation (PPPR) and Biocidal Products Regulation (BPR). PAN-E fears that the introduction of socio-economic elements into the PPPR and the BPR will weaken the EU's regulatory action on EDs. PAN-E is also very concerned about the allegedly too large influence of industry in the EU's regulatory decision-making. informed that PAN-E were providing guidelines to their members in order to inform them about the public consultation on EDs and motivating them to participate.

also stressed the following points:

-many studies showed that different pesticides have negative effects for human health. In the case of EDs, despite a still high level of scientific uncertainty, it is necessary to apply the precautionary principle. -the OECD Endocrine Disruptor Advisory Group elaborated test guidelines discussing the controversial issue of potency of EDs and concluded that potency was not an element of hazard identification but rather of hazard characterisation of EDs. Non-monotonic dose-response issues are also important in the scientific discussion as a tiny amount of EDs could activate the hormone system and induce adverse effects.

-effects of EDs were worst when exposure takes place during the early developmental stages.

COM asked what kind of scientific studies were available. replied that for the time being only pharmaceutical, epidemiological studies were available, most of them sociologic related to demography (on the high risk population: pregnant women and children). indicated that more scientific evidence would become available in the near future and economic impacts should not be considered in regulatory decision-making when protecting human health and the environment.

required details about our role in the ongoing impact assessment on criteria to identify EDs, the timeline, which DGs were leading the process and which ones were involved. She was interested to learn more about the EU position on chemicals in the TTIP negotiations with the US. reminded that US is in general much more flexible on regulatory measures on chemicals and that MRLs were one of their key concerns with regard to TTIP – the association fears that the EU could be forced to lower their MRLs as a result of TTIP. COM indicated that mutual recognition was not foreseen in the area of chemicals and pointed to the initial EU position paper on chemicals published on DG TRADE's website on 14 May 2014. Finally, PAN-E informed that they are also regularly in contact with SG, DG SANCO, DG ENTR, DG ENV and DG AGRI to discuss about their position on EDs.

Kind regards,



European Commission

DG TRADE

Unit D3 - Agriculture, Fisheries, Sanitary and Phytosanitary Market Access, Biotechnology

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