Minutes of a meeting with the European Crop Protection (ECP) of 19 June 2013

Participants

ECPA: E. Jones; A. Martin; P. Day

DG AGRI: H. Cappellaro; G. Seiwald (D3), A. Innamorati (H1)

Subject: endocrine disruptors (ED)

ECP representatives expressed their concerns on the developments of DG ENVI activities to prepare the new ED strategy.

They said there is too much scope in DG ENVI approach for political consideration not based on scientific evidence and in their discussion with stakeholders (DG ENVI " ad hoc" group) the positions of stakeholders are not taken into account.

DG AGRI asked if the last WHO state of science paper on ED (2012) would be an acceptable starting point for consideration or if the ECP would have problems with the approach. The answer was that although they are critical on the quality of the paper compared to previous WHO exercises, they find the WHO definition for ED a good starting point. DG AGRI then asked if the last EFSA opinion on ED (which is substantially in line the WHO paper) was also a good starting point for them. ECP declared that the EFSA paper is ok for them and they welcome the work done so far by DG SANCO on pesticides. Furthermore they expect developments on:

- thresholds, which can be approached for many active substances for which data are available.
- decisions should be based on hazards in a broad sense by looking at an array of criteria (e-toxicity, potency exposure, severity etc.) and on the real exposure scenarios and not on theoretical data.
- -examine the lead toxicological profile for any of the substances as toxicological tolerance may exceed EDs effects.

Defining criteria for ED shall take into account the above elements and should be as broad as possible in scope. This is because relevant decisions will have to be taken on a case by case situation.

In their view the DG ENVI strategy shall be as open as possible and shall take into account a wide spectrum of criteria. However, they are very concerned on the generation of a general list of ED that will have different effects in areas subject to different legislation (REACH- biocides-pesticides- water framework). Currently, only for pesticides a cut off criteria is legally applied (a substance being identified as an ED means banning this substance) and proportionality is not applied by DG ENVI.

During the meeting the following papers were handed over for information and are enclosed to this mail.

Enclosures:

- -ECP Position Paper on ED rev 3 of April 2013
- -Irish position paper (TEAGASC) of the impact of ED criteria on availability of Azoles
- -Nomisma slides presentation of Septemebr 2012 on economic importance of azoles in wheat production
- -Scientific paper on ED effects of micotoxines (zearalenone) in girls.

Horacio Cappellaro