

Helsinki, 10th November 2006

Is endocrine disruption within REACH?

As scientists invited to meet under the auspices of Finnish EU Presidency we call for an effective regulatory framework for endocrine disruptors under REACH.

We express specific concern at the phrasing of the proposed regulation with respect to endocrine disruptors.

We believe it would be prudent to reduce exposures to certain substances with endocrine disrupting properties, in order to protect future generations.

Given endocrine disrupting substances can act in an additive manner, precautionary action needs to be taken, even though, in isolation, such a substance may be judged unlikely to cause serious effects at current exposure levels.

Therefore, we consider that where scientific evidence shows a substance to have endocrine disrupting properties, there should not be a need to show that serious effects are probable, before this substance is subject to the REACH authorisation procedure.

We therefore strongly recommend the following alteration to the Council text for Article 56(f).

“Substances – such as those having endocrine disrupting properties, ...~~for which there is scientific evidence of probable serious effects to human health or the environment which give~~ which are identified, taking into account scientific evidence, as giving rise to an equivalent level of concern to those of the other substances listed... and which are identified on a case by case basis...”

In addition, we believe that where there are suitable safer alternatives to chemicals with endocrine disrupting properties then substitution should be a requirement.

Signed:

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