

# Public Consultation on Defining criteria for identifying Endocrine Disruptors in the context of the implementation of the Plant Protection Product Regulation and Biocidal Products Regulation

Fields marked with \* are mandatory.

## 1. Information about you

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All your answers to questions in sections 2, 3 and 4, are intended to be published on the web, together with some of your personal data (please read the specific [privacy statement](#) before answering the following questions). Please note that answers to questions 1.2 to 1.6, as well as 1.8 to 1.10 will not be published.

How would you like your contribution to appear?\*

- Under the name supplied** (I consent to the publication of all the information in my contribution, and I declare that none of it is subject to copyright restrictions that would prevent publication)
- Anonymously** (I consent to the publication of all the information in my contribution, except my name/the name of my organisation, and I declare that none of it is subject to copyright restrictions that would prevent publication)
- I ask for confidential treatment of my contribution and do not give consent for publication** (the contribution will not be published and its content may not be taken into account. In any case, the contribution will be subject to the rules on access to documents, Regulation (EC) No 1049/2001)

1.1. Your full name:\*

Bertrand Vallet

1.2. Your e-mail address for correspondence:\*

bertrand.vallet@eureau.org

1.3. Your gender:\*

- Male  Female

1.4. Your age:\*

- 15-24  25-39  40-54  55-64  65+

1.5. Your level of education (highest degree obtained):\*

- Primary school  
 Secondary school  
 Technical college or similar  
 University  
 Post-/University  
 Still in full time education

1.6. Your occupation:\*

- a. Self-employed  
 b. Employee  
 c. Not in formal working arrangement  
 d. Other

1.6.b. If employee, please specify:\*

- Professional (employed doctor, lawyer, accountant, architect)  
 General management, director or top management  
 Middle management  
 Civil servant  
 Office clerk  
 Other employee (salesman, nurse, etc...)  
 Manual worker  
 Other

1.7. I'm replying as a(n):\*

- a. Individual/citizen/consumer  
 b. On behalf of an organization

1.7.b.1. If responding on behalf of a(n) organisation/association/authority/company/body, please provide the name:\*

EurEau

1.7.b.2. Is your organisation listed in the EU transparency register?\*

- a. Yes  
 b. No  
 c. Do not know

1.7.b.2.a. Please specify identification number *(optional)*:

39299129772-62

1.7.b. Please specify the organisation you represent:\*

- i. Public authority
- ii. Academic/Research institution
- iii. Hospital / Health institution
- iv. Private company
- v. Agricultural producers (farmers)
- vi. Consumer / Non-Governmental Organisation
- vii. Industrial or trade association
- viii. Other

1.7.b.vii. If industrial or trade association, please specify:\*

- International
- National

1.8. Your location:\*

BE - Belgium

1.9. Would you say you live in a ...?\*

- Metropolitan zone
- Other town/urban centre
- Rural zone
- Do not want to answer

1.10. Were you or your organisation involved in scientific issues in relation to endocrine disrupting chemicals in the last 3 years and in which way? *(more than one answer possible)*\*

- Direct experimental scientific research
- Review of scientific research
- Use of scientific research for safety assessments
- Use of scientific research for regulatory purposes
- Lobbying
- Other
- Not involved

1.11. Were you or your organization directly involved in/affected by the EU legislation mentioned below in the past 3 years? *(more than one answer possible)\**

- Classification and Labelling (Regulation 1272/2008)
- REACH (Regulation 1907/2006)
- Plant Protection Products (Regulation 1107/2009)
- Biocides (Regulation 528/2012)
- Water Framework Directive (2000/60/EC)
- Cosmetics (Regulation 1223/2009)
- Chemicals Agents Directive (98/24/EC)
- Other
- Not involved

1.12. In what context have you been made aware of the discussions about endocrine disrupting chemicals?\*

- Media for the general public
- Scientific publications
- As part of my profession
- Schools, universities, etc.

## 2. Options for criteria for determination of endocrine disrupting properties

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The roadmap defines 4 different options for the establishment of criteria for determination of endocrine disrupting properties.

### 2.1. Questions regarding option 1 *(No policy change (baseline). The interim criteria set in the plant protection products and biocidal products regulations continue to apply. No other criteria are specified).*

2.1.1. Have you conducted or are you aware of an assessment of substances which would be identified as endocrine disruptors according to option 1?\*

- Yes
- No

2.1.2. Are you aware of any assessment(s) of substitutability of the identified substances?\*

- Yes
- No

2.1.3. Are you aware of any assessment(s) of the socio-economic impact if the identified substances were regulated without further risk assessment?\*

- Yes  
 No

2.1.4. Please, provide us with any other comments you may have regarding option 1:

*4,000 character(s) maximum*

## **2.2. Questions regarding option 2 (*WHO/IPCS definition to identify endocrine disruptors (hazard identification)*)**

2.2.1. Have you conducted or are you aware of an assessment of substances which would be identified as endocrine disruptors according to option 2?\*

- Yes  
 No

2.2.2. Are you aware of any assessment(s) of substitutability of the identified substances?\*

- Yes  
 No

2.2.3. Are you aware of any assessment(s) of the socio-economic impact if the identified substances were regulated without further risk assessment?\*

- Yes  
 No

2.2.4. Please, provide us with any other comments you may have regarding option 2.

*4,000 character(s) maximum*

## **2.3. Questions regarding option 3 (*WHO/IPCS definition to identify endocrine disruptors and introduction of additional categories based on the different strength of evidence for fulfilling the WHO/IPCS definition*)**

2.3.1. Have you conducted or are you aware of an assessment of substances which, in addition to those identified according to option 2, would be identified as suspected endocrine disruptors or endocrine active substances (Categories II or III) according to option 3?\*

- Yes  
 No

2.3.2. Are you aware of any assessment(s) of substitutability of the identified substances?\*

- Yes  
 No

2.3.3. Are you aware of any assessment(s) of the socio-economic impact if the identified substances were regulated without further risk assessment?\*

- Yes  
 No

Please, provide us with any other comments you may have regarding option 3.

*4,000 character(s) maximum*

#### **2.4. Questions regarding option 4 (WHO/IPCS definition to identify endocrine disruptors and inclusion of potency as element of hazard characterisation (hazard identification and characterisation))**

2.4.1. Have you conducted or are you aware of an assessment of substances which would be identified as endocrine disruptors according to option 4?\*

- Yes  
 No

2.4.2. Are you aware of any assessment(s) of substitutability of the identified substances?\*

- Yes  
 No

2.4.3. Are you aware of any assessment(s) of the socio-economic impact if the identified substances were regulated without further risk assessment?\*

- Yes  
 No

2.4.4. Please, provide us with any other comments you may have regarding option 4.

*4,000 character(s) maximum*

### 3. Options for approaches to regulatory decision making

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The roadmap defines 3 different options for approaches to regulatory decision making. Option A (no changes of the existing provisions in BPR and PPPR), Option B (introduction of further elements of risk assessment) where necessary and desirable to reduce potential socio-economic impacts, and Option C (introduction of further socio-economic considerations) where necessary and desirable to prevent adverse socio-economic impacts.

3.1. Have you conducted or are you aware of an assessment applying any of the 3 different options for regulatory approaches to decision making (option A-C) to substances identified as endocrine disruptors by any of the options for defining criteria (option 1-4)?\*

- Yes  
 No

3.2. Have you conducted or are you aware of an assessment of the socio-economic impact of the 3 different options for regulatory approaches to decision making (option A-C) for substances identified as endocrine disruptors by any of the options for defining criteria (option 1-4)?\*

- Yes  
 No

### 4. Other information

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4.1. Please provide any other data or information that could help the Commission to conduct its impact assessment.

*4,000 character(s) maximum*

Establishing an EU definition of endocrine disruptors (ED) will have a positive impact on water resource protection. EurEau, the voice of the water services in Europe, welcomes and strongly supports the European Commission's initiative to define criteria for ED. The absence of a definition for the last 15 years has a detrimental effect on the authorisation and therefore on the application of the Plant Protection Product Regulation (PPPR) and the Biocidal Products Regulation (BPR). Defining ED's will give the PPPR and BPR authority, as well as other legislative instruments involving ED.

EurEau supports the WHO/IPCS definition of ED. We insist that the precautionary principle should be applied with regards to endocrine active substances. Therefore, we strongly support option 3 of the proposed roadmap 'Aspect I - EU criteria to identify ED'.

EurEau advocates stringent cut-off criteria such as the assessment of endocrine disrupting properties of chemical substances in the authorisation process for all substances, which could have an impact on water resources. For this reason and not to delay the implementation of the definition on ED, we support option A of the proposed roadmap 'Aspect II - Approaches to regulatory decision making'. We believe that the ban of substances should be decided according to a hazard based approach which takes into consideration the risk of adverse impacts on water resources (groundwater and surface water).

Please provide the reference(s) if possible:

## Contact

✉ [EC-consultation-endocrine-disruptors@ec.europa.eu](mailto:EC-consultation-endocrine-disruptors@ec.europa.eu)

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