Dear President Juncker, President Schulz and Prime Minister Rutte

Criteria for Endocrine Disruptors

I write to you on behalf of an organisation representing the European Crop Protection Industry. With 20 member companies, including 13 SMEs, and associations across Europe, we represent more than 25,000 direct jobs, and invest more than €2 billion each year in research and development in Europe. We are an industry founded on innovation and science: This allows us to make significant contributions not just to the economy, but to solving some of the biggest challenges facing society such as food security.

We welcome the important work the Commission is doing to produce criteria for endocrine disruptors and given the importance of this issue for us, and also the European consumer, we wanted to take the opportunity – following our recent meeting with Commissioner Andriukaitis – to write to you on the subject.

We recognise the significant public health interest that surrounds the issue of Endocrine Disruption, and wanted to start out by saying that the safety of our products – for both human health and the environment - is of primary importance. We believe that this can continue to be achieved without impacting the ability of European farmers to control pests and diseases in the crops they grow. It would be counter-productive to ban substances that provide valuable benefits to farmers if that did not make any positive contribution to human health and environmental safety.

Within the bounds of the legislation we currently have, we believe that regulators should take into account all available and relevant scientific information – including potency, which is one of the important factors – when evaluating a substance for its potential endocrine-disrupting properties. To do anything else would be unscientific.

It remains our view that endocrine disruptors can and should be treated like most other substances of potential concern; that is, subject to risk assessment, considering both hazard and exposure. This was a conclusion reached by EFSA’s Scientific Committee and supported by the Commission’s own Scientific Committee on Consumer Safety (SCCS).

We remain concerned, as I am sure you are, by the way that science is increasingly misrepresented in the public and political debate: this can leave European consumers uncertain, and undermines their confidence in the EU food safety system and its ability to protect the food that they eat. The issue of endocrine disruptors is one that is complex; we hope that the final decision taken on this issue will not overlook that complexity in favour of a
decision that has significant consequences for consumers, farmers, trade, research and innovation in the EU, and beyond.

We remain at your disposal should you require any further information from our industry to support the decision making process in your respective institutions. We would also take the opportunity to draw your attention to our recent initiative to encourage an open and honest debate on pesticides, answer concerns, and promote the important benefits pesticides bring. Further information can be found at [www.ecpa.eu/with-or-without](http://www.ecpa.eu/with-or-without)

This letter has been copied to the Commissioners we feel have a significant interest in this file, along with the Chairs of the relevant committees in the European Parliament.

Yours sincerely

Jean-Charles Bocquet
Director General