

LET/17/PD/28035
24 May 2017

To: Members of SCOPAFF phytopharmaceuticals

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SCOPAFF meeting 30 May 2017 on criteria for endocrine disrupting properties

Dear SCOPAFF members

Ahead of the upcoming SCOPAFF-Phytopharmaceuticals meeting on 30 May 2017, we would like to once again express our significant concerns regarding the Commission's proposal for the criteria for endocrine disrupting properties.

The amendment to the derogation must be re-introduced if the Commission is committed to science-based legislation. ECPA is seriously concerned that this amendment is not being tabled for a vote alongside the proposal for criteria. While our first priority has always been to have the right criteria in place, rather than rely on a process of derogations, the changes put forward offered a positive step towards a more workable proposal. The derogation is also needed to ensure regulatory coherence with the Biocides Regulation (Regulation 528/2012).

ECPA has stated clearly that we cannot support the Commission's proposal for the criteria. While we agree with the use of the WHO/IPCS definition, it is not sufficient and does not allow authorities to clearly separate those substances that have the real potential to cause harm from those that do not. This cannot be achieved without incorporating hazard characterisation elements, particularly potency.

With the above in mind, **it is essential in the current political climate that the Commission does not allow itself to be swayed from science and evidence-based decision making on an issue as important as this.** EFSA concluded that endocrine disruptors can be regulated by risk assessment. We fail to understand why in this case the Commission ignores the advice of its own agency, removing the only element of risk assessment – the derogation - from consideration. We strongly urge the Commission to give Member States the opportunity to decide on the criteria and derogation together, by putting both to a vote on 30th May.

Yours sincerely



Euros Jones
Director, Regulatory Affairs ECPA