**EFSA’s opinion on endocrine disrupting chemicals adds confusion**

**and undermines the Pesticide Regulation**

**PRESS RELEASE**

*Brussels, 20-03-2013*

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The opinion of the European Food Authority EFSA on endocrine disruption as published today is a big disappointment for PAN Europe.

In fact, EFSA mainly adds confusion to the debate by introducing a new category of substances: the „Endocrine Active Substances” (EAS). The legal text agreed in the pesticide Regulation 1107/2009, doesn’t mention EAS and aims to ban pesticides with „Endocrine disrupting properties which may cause adverse effects ”. In reality EFSA didn’t propose criteria for endocrine disrupting properties and neither for adversity.

What they did is adding elements, which are not part of the Pesticide Regulation at all, mainly industry-developed ideas on mode-of-action, human relevance, secondary effects. Furthermore EFSA tries to undermine established EU rules by insisting on traditional risk assessment while there is a democratic decision to rule endocrines „hazard” based, meaning no exposure is allowed to humans and the environment. By trying to change the rules EFSA also disregards science; the Endocrine Society, the professional organisations for endocrinologists, agreeing with the legal text, states that „having endocrine disrupting properties itself is a reliable predictor of adverse outcome”.

The introduction of a new category of Endocrine Active Substances (EAS) by EFSA makes no sense. Legal text defines endocrine disrupting properties, while DG Environment is discussing endocrine disruptors. This will only add confusion and is a counterproductive move from EFSA. EFSA should in fact define the legal text, within their remit of food, and develop criteria for chemicals with endocrine disrupting properties, but they didn’t.

EFSA puts a lot of emphasis on an alleged capacity of the body to balance endocrine disruption and likes to exclude (minor) endocrine fluctuations for instance. Since reversibility is pure speculation this idea would open the door for industry to claim on a big scale effects are reversible. The EFSA idea is also a very dangerous one since the most critical effects will be on the unborn where reversibility is very unlikely in the developing organism. EFSA however chooses to ignore this most crucial element in promoting the ’reversibility’ theory.

While not developing criteria for the legal text, EFSA adds elements such as mode-of-action, human relevance and critical effect, which are no part of the legal text and serve to disqualify an observed adverse outcome.

Nevertheless PAN sees a few good points: attention for effects of endocrines disrupting chemicals during critical points of development and attention for effects of mixtures. In fact EFSA proposes more study on these points.