



**Ministry of Environment
and Food of Denmark**



**Government Offices of Sweden
Ministry of the Environment and Energy**

*La ministre de
l'Environnement, de l'Energie
et de la Mer,
en charge des relations
internationales sur le climat*

*Le ministre de l'Environnement
et de l'Alimentation*

La ministre de l'Environnement

Paris, le 20 juin 2016

Dear Commissioner,

The European Commission presented on June 15 criteria to identify endocrine disruptors in the field of plant protection products and biocides.

This project, in our opinion, is not likely to ensure a satisfactory level of protection of human health and the environment.

While we welcome the fact that the Commission refers to WHO definitions of endocrine disruptors and dispenses with potency among the proposed criteria, this project remains unacceptable.

Indeed, two provisions raise deep concerns :

1. Only substances that are known to cause an adverse effect relevant for human health or non-target organisms (this effect being a consequence of the endocrine mode of action) can be identified as endocrine disruptors for the implementation of these regulations. In fact, the scientific validation process is very long and comes after irreparable damage to human health and the environment has appeared. Therefore, it seems essential to apply the precautionary principle so that prohibitions could be decided as soon as environmental impacts are proven or even when endocrine disruption suspicions appear.
2. The draft modification of the regulation on Plant protection products does not fulfill the need to ensure the highest level of human health protection.

We insist upon the health costs of endocrine disruptors use, that several recognized studies estimate at 160 billion euros within the European Union. The Union must be coherent : if the proposed criteria were applied, bisphenol A would not be recognized as an endocrine disruptor.

**Monsieur Vytenis ANDRIUKAITIS
Commissaire européen à la Santé et la Sécurité alimentaire
Rue de la Loi, 200
1049 BRUSSELS
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Copie à : Monsieur Jean-Claude JUNCKER, Président de la Commission européenne

Two draft legislative acts, one under the biocides legislation, the other under the legislation on plant protection products will be presented for discussion on 22 June, during two special meetings of the relevant regulatory committees.

We invite you to amend this proposal in a more protecting way for citizens of the European Union's health, for now and for future generations.

Our services are mobilized to work with yours in the search for a satisfactory solution by then.

Yours faithfully,


Ségolène ROYAL


Esben Lunde LARSEN


Karolina SKOG