

From: MUELLER Jan Marco (BEPA)
Sent: Wednesday 29 May 2013 11:34
To: 'PBO@amchameu.eu'
Cc: GLOVER Anne (BEPA); DUDZINSKA Katarzyna (BEPA); 'meglena.mihova@eppa.com'
Subject: RE: Request for a meeting with AmCham EU: lacking impact assessment on endocrine disruption draft criteria

Dear Mr Bouygues,

The Chief Scientific Adviser is aware of the file and has met industry representatives on previous occasions to listen to their views on the matter.

Therefore, she does not see the need for any additional meeting. I am convinced that you have had the possibility to voice your concerns also in the formal regulatory process.

Best regards

Jan Marco Müller

Dr. Jan Marco MÜLLER

Assistant to the Chief Scientific Adviser / Assistent der Wissenschaftlichen Chefberaterin /
Assistant du conseiller scientifique principal



European Commission / Europäische Kommission / Commission européenne

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Internet: http://ec.europa.eu/commission_2010-2014/president/chief-scientific-adviser/index_en.htm

From: Pierre Bouygues [<mailto:PBO@amchameu.eu>]
Sent: Wednesday, May 29, 2013 9:36 AM
To: DUDZINSKA Katarzyna (BEPA)
Cc: GLOVER Anne (BEPA); MUELLER Jan Marco (BEPA); meglena.mihova@eppa.com
Subject: RE: Request for a meeting with AmCham EU: lacking impact assessment on endocrine disruption draft criteria

Dear Ms. Dudzinska,

Thank you for your reply.

The AmCham EU Environment Committee has just been informed that any decision on thresholds for endocrine disruptors would be adopted at the end of June.

Therefore, we would like to kindly request a meeting with Professor Glover before the end of June to discuss with her the importance of an impact assessment before adopting any decision on threshold for endocrine disruptors and to share with her some of the industry concerns and examples we have identified. We understand

that the schedule of Professor Glover must be very full, therefore the meeting would take place at the best convenience of Professor Glover.

Such a decision on threshold will have wide reaching implication for the REACH system and other EU environmental policy ,as well as for all industry actors who comply with this legislation, and we are worried to see that this decision, which is the source of many scientific debates, might be taken on political grounds, without first assessing what its impacts will be on the European Market.

At the American Chamber of Commerce to the EU this issue raises serious questions: we are a horizontal trade association, and will be impacted by such a decision, not only as chemical producers, but also as downstream users.

A decision to apply a no threshold approach to a substance which will be recognized as endocrine disrupting according to the Commission's guidelines, would have dramatic affects on all industries producing in Europe, and we would welcome the opportunity to share a few examples with you, as we think this question necessitates not only a through impact assessment, but also to be review by the Commission's scientific committee before any decision is taken. Currently, Scientific literature is inconclusive at best on the low dose theory, recommending precautionary bans on its basis would be a severe mistake.

Should you have any question, please do not hesitate to contact me at the AmCham EU Secretariat.

Best regards,

Pierre Bouygues

<image004.jpg>

Pierre Bouygues, Policy Officer

Consumer Affairs, Competition, Legal Affairs, Employment and Social Affairs
American Chamber of Commerce to the EU (AmCham EU)

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From: Katarzyna.DUDZINSKA@ec.europa.eu
[<mailto:Katarzyna.DUDZINSKA@ec.europa.eu>]

Sent: 28 May 2013 09:24

To: Pierre Bouygues

Cc: Anne.GLOVER@ec.europa.eu; Jan.MUELLER@ec.europa.eu

Subject: Request for a meeting with AmCham EU: lacking impact assessment on endocrine disruption draft criteria

Dear Pierre,

Thank you for your email. As discussed on the phone, I'm afraid Professor Glover will be unavailable for this meeting.

With kind regards,

Kasia DUDZINSKA

Secretary to the Chief Scientific Adviser
Secrétaire du conseiller scientifique principal

<image001.png>

European Commission / Commission européenne
Bureau of European Policy Advisers (BEPA) /
Bureau des conseillers de politique européenne (BEPA)
Tel.: +32 2 298 3156
Email: Katarzyna.Dudzinska@ec.europa.eu

From: Pierre Bouygues [<mailto:PBO@amchameu.eu>]
Sent: Monday, May 27, 2013 2:56 PM
To: DUDZINSKA Katarzyna (BEPA)
Subject: FW: Request for a meeting with AmCham EU: lacking impact assessment on endocrine disruption draft criteria

Dear Ms. Dudzinska,

Further to our conversation, please find below the meeting request that was sent to Ms. Glover last Friday.

As the Commission's ad hoc working group on endocrine disruptors will meet on Thursday 30 May, we would be very grateful if we could meet Ms. Glover prior to this meeting to discuss the lack of impact assessment to adopt any decision on threshold for endocrine disruptors.

As you may know, a decision to apply a no threshold approach to a substance which will be recognized as endocrine disrupting according to the Commission's guidelines, would have dramatic affects on all industries producing in Europe, and we would welcome the opportunity to share a few examples with you, as we think this question necessitates not only a through impact assessment, but also to be review by the Commission's scientific committee before any decision is taken. Currently, Scientific literature is inconclusive at best on the low dose theory, recommending precautionary bans on its basis would be a severe mistake.

I sincerely hope that a solution may be found to convey our concerns to Ms. Glover on this key issues for companies in Europe.

Kind regards,

Pierre

<image005.jpg>

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From: Pierre Bouygues
Sent: 24 May 2013 11:48
To: 'anne.glover@ec.europa.eu'
Cc: 'meglena.mihova@eppa.com'
Subject: Request for a meeting with AmCham EU: lacking impact assessment on endocrine disruption draft criteria

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Dear Ms. Glover,

As you may know, on 30 May the Commission's ad hoc working group on endocrine disruptors will meet, for what may be the last time, to decide on whether if not it should require a no threshold approach in its 'Commission recommendation on defining criteria for endocrine disruptors.'

Such a decision will have wide reaching implication for the REACH system and other EU environmental policy ,as well as for all industry actors who comply with this legislation, and we are worried to see that this decision, which is the source of many scientific debates, might be taken on political grounds, without first assessing what its impacts will be on the European Market.

At the American Chamber of Commerce to the EU this issue raises serious questions: we are a horizontal trade association, and will be impacted by such a decision, not only as chemical producers, but also as downstream users.

A decision to apply a no threshold approach to a substance which will be recognized as endocrine disrupting according to the Commission's guidelines, would have dramatic affects on all industries producing in Europe, and we would welcome the opportunity to share a few examples with you, as we think this question necessitates not only a through impact assessment, but also to be review by the Commission's scientific committee before any decision is taken. Currently, Scientific literature is inconclusive at best on the low dose theory, recommending precautionary bans on its basis would be a severe mistake.

We understand that your schedule must be very full already, but if there was a way to meet you, even if for only 15 minutes, before the 30 May meeting, we would be grateful for the opportunity to share some of the industry concerns and examples we have identified.

We thank you in advance for you time and consideration, and look forward to the opportunity of meeting you soon.

Kind regards,

Meglana Mihova,

* * *

AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled €1.9 trillion in 2012 and directly supports more than 4.2 million jobs in Europe.

* * *

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Pierre Bouygues, Policy Officer

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