Subject: EC Endocrine disrupting chemical legislation
Date: Fri, 12 Sep 2014 09:50:11 +0000
From: <Anne.GLOVER@ec.europa.eu>
To: <xxxx@wanadoo.fr>, <xxxx@ehn.org>, <xxxx@gmail.com>, <xxxx@greenpeace.org>, <xxxx@greenpeace.org>, <xxxx@theguardian.com>, <xxxx@euractiv.com>
CC: <xxxx@ec.europa.eu>, <xxxx@pan-europe.info>, <xxxx@corporateeurope.org>

Dear All

I am writing to you to correct mis-information regarding my role in the review of the Endocrine Disrupting Chemical (EDC) legislation by the Commission as you have either constructed or reported misleading comments regarding my involvement in this issue.

In particular, you have stated that I was responsible for a delay in Commission activity in this file. This is not the case and I have no formal role in any policymaking process in the Commission. In addition DG Environment did not ask for informal advice on this file, nor did I offer any. My first contact with DG Environment on this file was to ask the Director General to provide me with factual information to allow me to respond to a letter sent to me in June 2013 and signed by >70 scientists on the Commission's review of EDC regulation. I am obliged by Commission Staff Regulations to respond to any such correspondence unless it is vexatious or repetitive. At a later date (October 2013) I organised a meeting with only scientists present (no policymakers) to establish where the agreement and disagreement lay on various aspects of EDCs. The purpose of this meeting was to better understand the science and associated uncertainties. After this meeting, I forwarded a summary (agreed by all participants) of that meeting to DG Environment and DG Sanco, without recommendations. This summary was also published at the time on my website. These are the facts.

For your information, I include here an email from DG Environment who have the lead on this file. My question to DG Environment was:

" 01/09/14: **I would be grateful if you could provide me with a time line of the activity on the review of Endocrine Disrupters legislation. In particular, I am interested in when the decision was taken to delay the progress on the file and what prompted this decision. I am concerned about the misinformation currently circulating in the press regarding any input I have had in delaying progress in this area which stems from a lack of understanding of the process and a willingness to discredit the office of CSA within the Commission."**

Their response:

"04/09/14**: After consultation with relevant DG ENV colleagues, we can answer as follows.**

The sequence of events leading to the decision to do an impact assessment indeed had no input from your side.

By way of background, during 2010 – 2013 DG ENV lead a stakeholder discussion on endocrine disruptors which included the review of the 1999 strategy and the development of criteria. The stakeholder discussion was split in two part – a policy part chaired by DG ENV and a scientific part chaired by the JRC. Both completed their work by May 2013, although the final report on the JRC work was published later. The conclusions of the JRC reports and the opinion on endocrine disruptors by EFSA (and those of the

Kortenkamp report and past opinions of the SANCO Scientific Committees) are fully consistent: the science is sufficient to develop scientific criteria, certain elements (e.g. potency) are not part of the scientific criteria for hazard identification, there is a lack of test methods to identify effects caused by endocrine disruptors and there are two areas of scientific dispute (the threshold issues and the low-dose issue).

DG ENV developed proposed criteria in line with these conclusions and avoiding the need to resolve the two areas of scientific dispute and sent them to an interservice group which met in June and July 2013.

In parallel to this interservice discussion, the pesticides industry wrote to the Commission that the criteria DG ENV were developing would have an enormous economic impact on the EU agricultural industry and would have trade implications and an editorial signed by 18 editors of international scientific journals was published stating that the work of DG ENV was unscientific (unfortunately without any reference to which work they meant).

Based on this scientific controversy and the alleged significant impact on the EU agricultural industry, we decided in July 2013 to conduct an impact assessment.

You met with 6 scientists representing the two 'camps' in October 2013, arriving at conclusions which were again fully consistent with those reached by the JRC and EFSA work previously.

Hence your involvement was not at the stage in which the decision to carry out an impact assessment was taken, but rather after the decision had been taken and it contributed to re-establish the fact that the scientific controversy on endocrine disruptors was centred around two well-defined issues which were of less relevance to the development of the criteria.

As a final side remark, this leads to the conclusion that the DG ENV work criticised by the 18 editors was not the work on the development of the criteria, but rather the joint work with DG ENTR on reviewing for the purpose of REACH whether endocrine disruptors have a threshold or not. The latter was a separate activity which we finalised in June of this year with little criticism and broad support by all stakeholders using among other references the conclusions of your October 2013 meeting."

As the topic of endocrine disrupting chemicals was also the subject of various access to documents requests to the European Commission over the past 12 months, I can only conclude that many of you already had the above information.

High quality journalism or campaigning relies on diligent investigation and reporting of the facts even if they disagree with a preconceived ideology. In reporting or commenting on this issue, you have failed to do this and I ask you to withdraw the allegations that you made. Please also provide me with the evidence that you relied upon to publish your false allegations.

I look forward to your early response.

Anne Glover

(Also to be copied to Magali Reinert when an email address becomes available)

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