
From: [REDACTED]
Sent: Wednesday, February 20, 2013 6:56 PM
To: BOTTEX Bernard; [REDACTED]
[REDACTED]
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[REDACTED]
Cc: JACOBS Miriam; LIEM Djien; SCHOONJANS Reinhilde
Subject: RE: EFSA opinion on EAS - updated version
Attachments: [REDACTED] SC_1495 DRAFT_opinion_EAS version 10.doc
Categories:

Dear Colleagues,

Life is complicated. I have now, since yesterday, been reading the WHO-UNEP (State of the Science on Endocrine Disrupting chemicals – 2012) report. I find this report good and in a balanced way reporting on the current knowledge on endocrine disruption, endocrine disrupting chemicals and health outcomes which may have an ED background. The author and contributor list is impressive and includes a majority of the scientists who been the most prominent in the ED field over the last 15 years. It is difficult to say anything else than this report represent the best scientific knowledge and assessment of the ED issue that the scientific world could produce today.

Therefore, it is almost embarrassing to compare our current draft report with the WHO-UNEP report. The issues the WHO-UNEP report highlight and takes out as being specific for EDs, we in our report are trying to down-play or even avoid, when WHO-UNEP comes to the conclusion that traditional risk assessment of chemicals is not fit for purpose to assess EDs (p 17), we are exactly coming to the opposite conclusion, the current procedure is fit for purpose and will cover EATS modalities. WHO-UNEP takes out the importance of low dose and NMDRCs as being particular with respect to endocrine responses, they highlight the importance to assess and understand combined exposures for ED responses and they discuss elegantly why "thresholds" could not be applied to EDs. We stay at the best "luke-warm" to these issues. [REDACTED] indicated in her Email today, based on conclusions from the different chapters in WHO-UNEP report, where there are important discrepancies between the 2 reports, they are many and they are significant. I am happy I don't need to be at the press conference and stakeholder meeting (as planned the 20 March) and present and defend the current EFSA SC report knowing that the audience have read the WHO-UNEP report. A straight forward killer situation!

Many are waiting for the EFSA SC opinion and what it will bring. Since [REDACTED] is one of the editors of the WHO-UNEP report it has got a lot coverage in Swedish media. Yesterday MP Åsa Westlund, who is the rapporteur for the European Parliament resolution on ED and ED effects, remarked that the WHO-UNEP report strengthened the arguments in the EP resolution to be voted on later in February and that EP will strongly force the Commission to take action to reduce exposure to EDCs. She also mentioned that EFSA is going to make recommendations on the definition of ED. Today, to the background of the WHO-UNEP report, the Swedish Environment Minister said in a debate with Environmental NGOs and representatives for industry, that EDC was one of her priorities and that she particularly was waiting for what EFSA was going to recommend, particularly with the definition of EDs. Clearly high political pressure and high expectations!

I cannot see any other way out of this than we have to re-do our report or at least significantly modify it. My proposal is to use the WHO-UNEP report and analyse what are the scientific implication with respect to the questions asked by DG SANCO. This would need an additional meeting with the working group and maybe some postponing of the final delivery to DG SANCO with a few weeks. EFSA can have good arguments for this. Every participant should do their homework

before the meeting and be familiar with the WHO-UNEP report. This is the only way how we can give fair and updated advise, reflecting the best available knowledge.

Finally, I regret that I did not fight harder to get acceptance of the working group to work with EASs instead of endocrine disrupters. I know that the Terms of Reference asked for ED effects, but I cannot see any reason why the EFSA SC would say that the time is not mature yet to discuss EDs, but we can propose a way forward based on the EAS concept. We would propose a strategy to identify EASs and we could wonderfully have used the WHO-UNEP report as a next step way forward in identifying EDs, with all the precautions and restrictions it takes. Unfortunately we did not do this and now we are in a mess!

I attach the draft document with comments. I have not had time to make changes in the text, and actually I am waiting for instructions on how we are going to proceed. I am available to actively participate in a re-writing of the opinion if it will be of help and can be solved from an administrative point of view.

Kind regards,

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