

Euro Coop contribution to the European Commission's Roadmap: "Harmful chemicals – endocrine disruptors, review of EU rules"

- Setting the context

Endocrine disruptive chemicals (EDCs) are a broad category of compounds used in consumer products, electronics and agriculture that have been associated with a diverse array of health and environmental issues. These non-natural chemicals or mixtures of chemicals can mimic, block, or interfere with the way the body's hormones work. Because of their pervasiveness in consumer products, they are **since long under strict scrutiny from consumer co-operatives** due to the **high standards** they adopt when it comes to **consumer protection and care for the environment**.

Several consumer co-operatives across Europe have indeed a long tradition of **going beyond legislation** in order to protect consumers from hazardous chemicals, especially by rigorously applying the **precautionary principle**. For instance, Coop Denmark has banned EDCs in all private label products and Coop Italy has phased out per- and polyfluoroalkyl substances (PFAS) from all its own-branded personal care line. Coop Denmark has also recently extended PFAS banning to all its non own-brand suppliers. From its side, the S-Group in Finland applies the precautionary principle for the EDCs used in **cosmetics, personal care products and household detergents**. According to their quality requirements, substances evaluated by the EU or other leading official organizations as causing or potentially causing endocrine disruption must not be present in their private brand products.

- A call for action

Against this background, consumer co-operatives grouped in Euro Coop call on the European Commission to **act more boldly and more swiftly** when it comes to EDCs in order to better protect consumers and the environment. In this respect, we would like to draw its attention to the need to act on the following points:

- Allocate more resources to the development of a **"thorough research basis"** on which to base policy on EDCs, especially when it comes to:
 - o Formulating **clear definitions**: this will allow the subsequent identification of the doses allowed into the manufacturing of a given consumer good - **"safe level of exposure"** – or, alternatively, determine that no safe level exists;
 - o Investigating how multiple endocrine disruptors can work together to create compounding effects (**"cocktail effect"**);
 - o Investigating the **nexus between cosmetics and EDCs**: sunscreens are for example under suspicion of containing EDCs. Whilst the connection is not clear, **opt for safer alternatives which are already available on the market** (e.g. under the Swan label);
- **Take a "group approach" in legislation**. For example, for bisphenols, only **Bisphenol A (BPA)** is well regulated whilst it is not the same for several other bisphenols presenting the same problematic. Also, in the case of PFAS, EFSA has recently announced a lowering of the Tolerable Daily Intake (TDI) of 1750 times and regulative action from the EU is still lacking. Also in this case, a "group approach" could allow for a much needed swifter regulation to the benefit of consumers and the environment;

- **Consider the costs of inaction.** Allowing hazardous and harmful chemicals into consumer goods has a derived cost for all EU-members. Formulate KPIs which include such costs will help securing the necessary EU and national funding for public research programmes as well as boost product innovation at company level;
 - Evaluate **essential use** for all harmful chemicals;
 - Keep the **same requirements for recycled material as for the virgin one**;
 - Develop **testing methods** in order to be able to assess consistently chemicals which are continuously created and put on the market untested; For instance, there is estimated 5000 different PFAS in global circulation, but by using harmonized testing standards we are only able to test for 45 specific PFAS in textiles;
 - Boost uptake of the **EU Ecolabel** or equivalent (e.g. Nordic Swan) and work for the criteria which allow for their obtention to be continuously strengthened following the latest scientific findings;
 - **Better enforce legislation on imports** from outside the EU as well as on **consumer goods bought online**;
 - Encourage an **active dialogue** among scientists, public authorities and private actors in the field;
 - Contribute to creating a marketplace which is more aware of the environmental and health challenges posed by hazardous chemicals through **ad-hoc communications campaigns**;
 - Boost **B2B and business to regulators information exchange** on hazardous chemicals;
 - Recognize the importance of early warnings and apply consistently the precautionary principle.
- **Conclusions**

Consumer co-operatives grouped in Euro Coop believe it is **crunch time** for the European Commission to act on EDCs in a swifter and more incisive manner and sees the publication of the present roadmap and ensuing public consultation as big opportunities not to be missed to deliver more safety on hazardous chemicals to the benefit of consumers and the environment. We therefore invite the European Commission to take the afore-mentioned action points into due consideration when designing the upcoming consultation on EDCs for the public debate to be stirred in the right direction.

The European Union is worldwide regarded as a **reference point** when it comes to chemicals standards and it is therefore of capital importance that it keeps operating on the basis of the **best available scientific knowledge** and **legal certainty** to protect consumers and the environment also beyond the EU boundaries, thereby making a direct contribution to a swifter attainment of the **Sustainable Development Goals (SDGs)**.

About Euro Coop

Euro Coop unites **20** national organisations of consumer co-operatives in Europe, representing **34 million** consumer-members, **7.000** local co-operatives, **750.000** employees and operating **76.000** stores across the continent. Consumer co-operatives, predominantly engaged in retail, are enterprises with a distinct model of ownership and governance, which, **since 1844**, have been operating according to the co-operative principles such as voluntary and open membership (Principle 1) and democratic member control (Principle 2) based on the rule of 1 member-1 vote. Being owned and managed by their members, consumer co-operatives have an inherent responsibility far-reaching past the cash register, such as care for the community (Principle 7) and all its social, economic and environmental facets.
