



The European Environmental Bureau supports the identification of BBP, DEHP, DBP and DIBP as substances of high concern because of their endocrine disrupting properties as proposed by Denmark.

The endocrine disrupting properties of these four phthalates have been well described in the scientific literature (see references below), as summarized in the Annex XV dossier presented by Denmark.

BBP, DEHP, DBP and DIBP are present in a wide range of consumer articles. They are ubiquitous contaminants that can be found in all European Environment compartments (air, waters -even rain water, soils) as well as in blood and urine samples of all sampled European population (see references below).

These phthalates have already been identified as SVHC on the basis that they are toxic to reproduction (Repr. 1B), and, although it is known that the reprotoxic effects of phthalates are endocrine mediated, the endocrine disrupting properties of these substances have not been taken into account by RAC during the opinion development on several applications for authorization.

Furthermore, RAC derived reference DNEL for several phthalates (DEHP, DBP, BBP). In our view, it is not scientifically possible to establish a safe level of exposure for endocrine disruptors. Indeed, EU scientists have reached a consensus that there may be no thresholds for endocrine disrupting chemicals (EDC) as concluded at the Meeting on EDCs at the Office of the European Commission's Chief Scientific Adviser, held in Brussels on 24 October 2013.

According with REACH article 60(3a), adequate control route shall not apply for substances meeting the criteria in CMR or article 57(f) for which it is not possible to determine a threshold in accordance with Section 6.4 of Annex I;

However, RAC dismissed the ED properties of the stated phthalates and assumed that (by default) a DNEL can be set for all reprotoxicants disregarding the reprotoxicity and endocrine disruption overlapping endpoints of phthalates as well as its mixture effects.

As a consequence, using these reference DNELs and not taking into account ED properties, RAC has concluded in several opinions on applications for authorization, that the risks posed by some of these phthalates (DEHP, DBP) to the general public and in many cases also to workers are adequately controlled.

Therefore, the identification of BBP, DEHP, DBP and DIBP as substances of high concern on the basis of their endocrine disrupting properties is necessary in order to phthalates being considered as non threshold substances and hence adequately protect European citizens' health and the environment from their risks.

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