

European Association representing the trade in cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply
Comité du commerce des céréales, aliments du bétail, oléagineux, huile d'olive, huiles et graisses et agrofournitures

Brussels, 29 July 2016

COCERAL position paper

On the Commission's proposal setting out scientific criteria for the determination of Endocrine Disrupting properties

COCERAL, the European association representing the trade in cereals, rice, feedstuff, oilseeds, olive oil, oils and fats and agrosupply, is concerned that the definition of **Endocrine Disruptors (EDs)** proposed by the Commission in its draft **criteria to identify EDs in Plant Protection Products (PPPs)**, being purely hazard-based, may be restrictive beyond the needs of safety concerns.

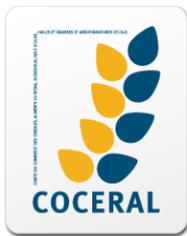
The related major concerns for COCERAL are:

- **A decreased availability of safe and necessary PPPs on the market.** Substances could be withdrawn even when the risks to human health and the environment are negligible and their socio-economic benefits are important. Such a reduced availability of PPPs on the EU market may negatively impact the yield and quality of agricultural and horticultural production in Europe while reduce productivity. Besides, it may lead to higher risks to develop resistance in populations of harmful organisms.
- **Increased hurdles with regards to food and feed imports.** Considering the strong EU dependency on the global market for the supply of protein-rich raw materials, a high attention must be paid to mitigate the potential impact of ED criteria on EU imports via the setting of Import Tolerances (ITs).

COCERAL deems necessary to call on the Commission to:

- Introduce at least **hazard characterisation elements** in the criteria identifying EDs, thus using the possibility foreseen by the so-called option 4 of the 2014 [roadmap](#), i.e. "WHO/IPCS definition to identify endocrine disruptors and inclusion of potency as element of hazard characterization". Indeed, option 4 ensures the same level of consumers safety than option 2 (i.e. sole WHO/IPCS definition), whilst having a significantly lighter impact on the economic sector than option 2. While considering two options of equal benefit in terms of public health, priority should be given to the one with the less adverse impact on economic operators.
- **Reconsider the opportunity to base EDs related decision on a sound risk assessment, including also exposure.** COCERAL believes that a risk, rather than a hazard-based approach, would ensure the necessary human health and environmental protection, whilst allowing the production of safe, sufficient and affordable food for the EU population. This is in line with recent scientific indications by the European Food Safety Authority (EFSA)¹.

¹ EFSA [opinion](#) on the identification/characterisation of EDs and related scientific criteria and test methods (2013), also supported by the Scientific Committee on Consumer Safety (SCCS) in 2014, with its [Memorandum on Endocrine Disruptors](#).



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- Take account of the possible **socio-economic impact**.
- Avoid letting the EDs criteria severely impact on the procedures set by Regulation 396/2005 to set **Maximum Residue Levels** and **ITs**.

COCERAL members are committed to provide EU consumers with high quality food and feed, in compliance with the safety requirements established by the EU in order to safeguard human, animal and plant health and to protect the environment. At the same time, COCERAL members are aware of the need to face global competition, to promote the EU high standards and to meet the world food and feed demand.

A continued availability of a range of safe PPPs, authorised by a transparent, reliable and predictable science-based process, is necessary for meeting the challenges at stake.

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COCERAL is the European association of trade in cereals, rice, feedstuffs oilseeds, olive oil, oils and fats and agrosupply. It represents the interest of the European collectors, traders, importers, exporters and port silo storekeepers of the above mentioned agricultural products. **COCERAL's** full members are 26 national associations in 18 countries and 1 European association [Unistock]. With about 3500 companies as part of **COCERAL** national members, the sector trades agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses. **COCERAL** has two associated members in Switzerland and Serbia and one extraordinary member Gafta.