IFRA attended the CASG-ED meeting on February 7th on behalf of DUCC. The Commission has asked stakeholders to provide comments on the two agenda topics:

1. Possibilities to include ED in the existing international system for classification of chemicals (UNGHS) and in CLP.
2. Update of REACH annexes to include data requirements on endocrine disruption

Some DUCC members, namely, ATIEL, CEPE, EFCC and IFRA, would like to make the following comments on one of the abovementioned points.

1. Possibilities to include ED in the existing international system for classification of chemicals (UNGHS) and in CLP

ATIEL, CEPE, EFCC and IFRA do not think that the inclusion of new EDs hazard classes in GHS/CLP brings any added value and rather thinks that it would actually undermine the basic principle of hazard communication based on the following points:

- ED stands for Endocrine and Disruption. Disrupting effects are already captured by GHS/CLP.
- GHS/CLP aims at strictly classifying hazards of chemicals without considering exposure and not managing risks but does not aim at classifying modes of action.
- Endocrine activity (EA) is a mode of action that may or may not lead to adverse effects. The understanding of modes of action does not offer benefit for hazard communication but may be relevant for aggregated risk assessment of multiple substances presenting the same mode of action. This is true for any mode of action and not specifically EA.
- CLP is designed to communicate hazards. Endocrine activity is not a hazard *per se*; a disrupting effect is a hazard and is already captured. Should ED become a new hazard class, it would be redundant and lead to miscommunication and hence undermine the fundamentals of GHS/CLP.
- A risk assessment is possible for a substance presenting a threshold (NOAEL, DNEL, PNEC…). When such threshold exists, the identification of an ED mode of action will not affect it. Hence it is still possible to carry out a risk assessment.
- ED should be regulated on the basis of risk as stated by certain scientific bodies (e.g. SCCS[1]). Indeed, an identical substance could be restricted following a

[1] Scientific Committee on Consumer Safety

hazardous property approach and at the same time based on risk it could be rightly and safely used. EU legislation on endocrine disruptors should allow risk-based approach to decision-making. There is no need for categories. It has been the position of the EU institutions when adopting the criteria for Biocidal Products and Plant Protection Products Regulations.

- REACH is the right tool to assess whether the mode of action of general chemical substances present a risk based on relevant uses. The REACH Substance Evaluation process allows for data generation in case of concern. Risk management is best achieved via sector legislation, taking the specifics of uses and exposure into account.

  NB: here above we have not separated GHS and CLP as we think that as a general principle they should be aligned as much as possible. Creating new hazard classes only in Europe would be significant deviation from the harmonization objective of GHS.