



Utrecht/Brussels, 5 September 2006

RE: Second Reading draft regulation REACH

Dear Member of the Environment, Public Health and Food Safety Committee of the European Parliament,

We are writing to you on behalf of Women in Europe for a Common Future and the European Women's Lobby, two large European networks of women's organisations concerning the second reading of the draft REACH regulation by the European Parliament.

The outcomes of the plenary vote concluding the first reading on the draft Regulation REACH were only partly positive for women and future generations. The Parliament's clear vote for the mandatory substitution of the most dangerous chemicals on the market was very positive news for women. This will ensure that exposure to such substances and their long-term health effects, which are an especially high factor of concern for women's health, will come to an end. However, the watering down of information requirements in the registration phase of REACH is disastrous. In practical terms this means that we will continue to live with the existing information status quo for chemicals and that, therefore, it will be difficult to identify high concern chemicals as candidates for substitution.

We are working for a life without the threat of hazardous chemicals- not only because it is better for women and men but also because it is essential for future generations. Women and future generations are affected most by the long-term health effects of hazardous chemicals. The **European Gender Equality Roadmap for 2006-2010¹ recognizes chemicals as a special health risk to women**, "*as they are often transmitted during the pregnancy and through breast-feeding*"². Consequently, the Roadmap asks for the gender dimension in health to be recognised. This should also be done through the REACH regulation. We believe, that REACH can make a valuable contribution to protecting and improving women's health and that of future generations by substituting high concern chemicals as well as generating full data sets on chemicals to identify high concern chemicals in the first place. We, therefore, ask you to **support the following key demands during the second reading:**

1. Replace hazardous chemicals with safer alternatives whenever they exist.

The REACH system needs to systematically promote safer alternatives, which are suitable to replace chemicals causing cancer, changes in DNA, miscarriages and birth defects as well as those that build up in our bodies and the environment or interfere with the hormone system. We ask you to **uphold your commitment** to the phase-out of hazardous chemicals!

¹ COM(2006)92 final

² European Roadmap for equality between women and men, section 1.5. page 4

2. Sufficient safety and exposure information to identify dangerous chemicals and safer alternatives.

We believe that a chemical safety report needs to be completed for substances from 1 tonne per annum onwards (*as proposed by the European Parliament*). This will ensure that 20.000 low-volume chemicals are properly investigated for their health and environment effects as otherwise the safety information will not result in any practical improvements.

3. A Duty of Care provision for the chemicals industry (*as proposed by the European Parliament*)

The Chemicals Industry, like any other industry, needs to take responsibility for the safety of its products. A legally binding duty of care will ensure that the industry lives up to this responsibility to make sure that chemicals not covered by REACH will be safe for women and future generations

4. Strengthening Consumers Rights

Very often, women are the 'chief purchasing officers' in the household. They also heavily consume everyday products that may contain hazardous chemicals. We believe it is our right to know what a product is made of. Consumers have to be able to obtain sufficient information, so that they can make informed decisions about the products they buy.

Should you have any further questions regarding the matters raised above, please do not hesitate to contact us. Your leadership and support on this issue is crucial to ensure a safe and sustainable for the future European chemicals policy and we very much hope that in making your decision you will take into account the point of view of the women of Europe that we represent. This once-in-a-lifetime chance cannot be wasted.

In the meantime we remain,

Yours sincerely,



Sascha Gabizon
International Director WECF



Kirsti Kolthoff
President of EWL

Supporting organisations

The **European Women's Lobby (EWL)** with more than 4000 member organisations across Europe is the largest platform of women's organisations in the EU, working to achieve equality of women and men in Europe and to realise women's human rights. <http://www.womenlobby.org>

Women in Europe for a Common Future (WECF) is representing 63 women's and environment organisations from 27 countries in the EU and the Pan-European region. WECF works to help women in making their communities healthier and more sustainable, to raise the awareness of root causes of environmental health effects and promoting preventative action at the source. www.wecf.org