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UFFICIO EUROPEO DELL'AMBIENTE ■ OFICINA EUROPEA DEL MEDIO AMBIENTE ■ SECRETARIADO EUROPEU DO AMBIENTE
EUROPÆISK MILJØSEKRETARIAT ■ ΕΥΡΩΠΑΙΚΟ ΓΡΑΦΕΙΟ ΠΕΡΙΒΑΛΛΟΝΤΟΣ ■ EUROPEISKA MILJÖORGANISATIONERS SEKRETARIAT
DET EUROPEISKE MILJØBYRÅ ■ EUROOPPALAINEN YMPÄRISTÖTOIMISTO ■ EVROPSKI OKOLJSKI URAD ■ TAQSIMA AMBJENTALI EWROPEJA
EVROPSKÝ ÚRAD PRO ŽIVOTNÍ PROSTŘEDÍ ■ EUROPEJSKIE BIURO OCHRONY ŚRODOWISKA ■ EURÓPAI KÖRNYEZETVÉDELMI IRODA
EURÓPSKY ÚRAD PRE ŽIVOTNÉ PROSTREDIE ■ EUROPOS APLINKOS BIURAS ■ EIROPAS VIDES BIROJS ■ EUROOPA KESKKONNABÜROO

Mr. Jyrki Katainen, Vice President for Jobs, Growth, Investment and Competitiveness
European Commission
Rue de la Loi 200
B- 1049 Brussels

Brussels 24 November 2014

RE: European and international civil society organisations ask Commission to reject authorisation of hazardous DEHP in PVC plastic

Dear Vice President Katainen,

We, the undersigned human health and environment public interest groups, strongly oppose any authorisation under REACH regulation for the use in Europe of the phthalate DEHP in PVC plastic items for the following reasons:

- By granting authorisation for the use of DEHP in a wide range of PVC products and in recycled PVC plastic, the Commission will fail to uphold the main objective of REACH, the protection of health and environment;
- DEHP is a substance of very high concern, highly toxic and hormonally active substance;
- DEHP is widely used such that there is ongoing exposure;
- Safer alternatives to DEHP are generally available;
- The applicants for authorisation did not fulfil the conditions necessary for granting an authorisation under REACH;
- The European Chemicals Agency's (ECHA) opinion to allow the ongoing use of DEHP in a wide range of PVC plastic products is the result of a secretive and procedurally flawed process;
- ECHA's Socio Economic Assessment Committee (SEAC) rubber stamps 'business as usual' at the expense of innovation and safer products.

Therefore, we the undersigned organisations ask the Commission not to grant authorisation for the continued use of DEHP in PVC plastic products. The Commission needs to support the goals of REACH; the Commission is accountable to the European public for protecting citizens and the environment from hazardous chemicals, whilst promoting innovation including with respect to safer chemicals and products to ensure a resilient economy.

Yours sincerely,

Jeremy Wates,
Secretary General of the European Environmental Bureau

EUROPEAN ENVIRONMENTAL BUREAU (EEB) | BUREAU EUROPEEN DE L'ENVIRONNEMENT (BEE) Federation of Environmental Citizens' Organisations
Boulevard de Waterloo 34 | B-1000 Brussels | Belgium | **Tel.**: +32 2 289 1090 | **Fax:** +32 2 289 1099 | **E-mail:** eeb@eeb.org
Websites: www.eeb.org, www.ecotax.net, www.participate.org, www.chemicalreaction.org

On behalf of:

European Organisations:
Action For Breast Cancer Foundation
ClientEarth
European Academy for Environmental Medicine (EUROPAEM)
European association EUROSOLAR for renewable energy
European Environmental Citizens Organisation for Standarisation (ECOS)
The European Environmental Bureau (EEB)
Greenpeace
Health and Environment Alliance (HEAL)
Health Care Without Harm Europe (HCWH Europe)
Pesticide Action Network-Europe (PAN-Europe)
Women in Europe for a Common Future (WECF)
Zero Waste Europe (ZWE)

EU National Organisations:
Alliance for Cancer Prevention, UK
Arnika Association, Czech Republic
Spanish association for environmental education-Asociación Española de Educación Ambiental (AEEA)
Baltic Environmental Forum (BEF), Lithuania
Breast Cancer UK
The British Society for Ecological Medicine (BSEM)
Calla - Association for Preservation of the Environment Calla/Sdružení pro záchranu prostředí, Czech Republic
The Cancer Prevention & Education Society (CPES), UK
El Centre d'Ecologia i Projectes Alternatius (CEPA), Spain
Centre for Environment and Health- Centrum pro životní prostředí a zdraví, Czech Republic
Centre for sustainable alternatives (CEPTA), Slovakia
Ecologists' federation of Catalunya- Federació Ecologistes de Catalunya (CEPA-EdC), Spain
CHEM Trust, UK
ČSOP JARO Jaroměř, Czech Republic
The Danish Consumer Council
The Danish Ecological Council
Ecobaby Foundation, The Netherlands
Ecological Recycling Society (ECOREC), Greece
Ecologistas en acción, Spain
Fédération Inter-Environnement Wallonie (IEW), Belgium
Fondo para la Defensa de Salud Ambiental-Fodesam, Spain
France Nature Environnement (FNE)
Friends of the Earth Czech republic-Hnutí DUHA
Friends of the Earth Germany-BUND
Friends of the Earth Netherlands-Milieudefensie
Fundació Catalana per a la Prevenció de Residus i el Consum Responsable –FPRC, Spain
Fundación Alborada, Spain
Fundacion Vivo Sano, Spain
Greenpeace Czech Republic
Institute for Sustainable Development, Slovenia
Instituto Ecohabitar para la sostenibilidad, Spain
Jegrelius Institute for Applied Green Chemistry, Sweden
MEDITERRANEAN SOS Network (MedSOS), Greece
The Pregnancy, Childbirth and Parenting Centre- Initiativ Liewensufank, Luxemburg
Quercus – National Association for Nature Conservation, Portugal
Réseau Environnement Santé (RES), France

UK Royal College of Physicians
South-Eastern Norway Regional Health Authority-Helse Sør-Øst RHF
Swedish Society for Nature Conservation (SSNC)
Wemos Foundation, The Netherlands

International organisations:
The Center for International Environmental Law (CIEL)
Clean Production Action (CPA)
Environmental Health Strategy Center

CC:
Mr. Frans Timmermans, First Vice-President, Better Regulation, Interinstitutional Relations, the Rule of Law and the Charter of Fundamental Rights
Ms. Elżbieta Bieńkowska, Commissioner for Internal Market, Industry, Entrepreneurship and SMEs
Mr. Karmenu Vella Commissioner for Environment, Maritime Affairs and Fisheries
Mr. Vytenis Andriukaitis, Commissioner for Health & Food Safety
Ms. Věra Jourová, Commissioner for Justice, Consumers and Gender Equality
Mr. Carlos Moedas, Commissioner for Research, Science and Innovation
Ms. Cecilia Malmström, Commissioner for Trade
Ms. Margrethe Vestager, Commissioner for Competition
Mr. Pierre Moscovici, Commissioner for Economic and Financial Affairs, Taxation and Customs

Mr. Karl Falkenberg, Director-General, DG Environment, European Commission.

Mr. Daniel Calleja Crespo, Director-General, DG Enterprise and Industry, European Commission.

Competent Authorities for REACH and CLP (CARACAL)

Mr. Geert Dancet, Executive director, European Chemicals Agency (ECHA)

In view of the public interest in this matter, we intend to make this letter publicly available.