



Mr. Daniel Calleja Crespo, Director-General
DG GROW — Internal Market, Industry, Entrepreneurship and SMEs

Mr. Karl Falkenberg, Director-General
DG ENV — Environment

European Commission
Rue de la Loi 200
B- 1049 Brussels

Brussels 26 January 2015

RE: European civil society organisations ask Commission to reject authorisation of the substance of very high concern DEHP in PVC plastic

Dear Director-General Calleja Crespo, dear Director-General Falkenberg,

Prior to the decision of the Commission about whether to grant authorisation of the continued use of diethylhexyl phthalate (DEHP) in keeping with the opinions of the Risk Assessment Committee (RAC) and Socio-Economic Committee (SEAC), we, the undersigned environment and health not-for-profit organisations, ask the Commission to consider some procedural and substantive flaws of the opinions and the way they were taken.

We call on the Commission to review the applications and ECHA's opinions in light of the concerns outlined in the enclosed note and to reject the applications for authorisation of the uses of DEHP in both raw and recycled polyvinyl chloride (PVC).

Granting the authorisations applied for would not be in compliance with the provisions of REACH and would undermine the main objective of REACH “to encourage and [...] to ensure that substances of high concern are eventually replaced by less hazardous substances or technologies where suitable economically and technically viable alternatives are available”.

The Commission needs to support the goals of REACH; it is accountable to the European public for protecting citizens and the environment from hazardous chemicals, whilst promoting innovation to ensure a resilient economy including with respect to safer chemicals and products.

Yours sincerely,

Jeremy Wates,
Secretary General of the European Environmental Bureau

On behalf of:

European Organisations:

ClientEarth

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)

EU National Organisations:

CHEM Trust, UK

The Danish Ecological Council

Ecologistas en acción, Spain

Friends of the Earth Germany-BUND

CC:

Mr. Antti Ilmari Peltomaki, Deputy Director-General - Responsible for Dir B, C, E and F, DG GROW, European Commission

Mr. Gwenole Cozigou, Director, Dir I — Resources Based, Manufacturing and Consumer Goods Industries

Mr. Kestutis Sadauskas, Director, Dir A — Green Economy, DG ENV, European Commission

Mr. Klaus Berend, Head of Unit, REACH, DG GROW, European Commission

Mr. Bjorn Hansen, Head of Unit, Chemicals, DG ENV, 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.