CHEMICALS ARE NOT *GENDER NEUTRAL*

THE FIRST INTERNATIONAL CONFERENCE OF THE GLOBAL FRAMEWORK ON CHEMICALS



WHY THE **GENDER ACTION PLAN** IS THE LITMUS TEST FOR A FAIR CHEMICALS POLICY

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Why the Gender Action Plan is the litmus test for a fair chemicals policy

Chemicals policy addresses issues that run deep into our everyday lives and into societal power structures: Which bodies are affected by harmful chemicals, and in what ways? Who works with hazardous substances, and under what conditions? Who lives near production facilities or contaminated sites? Whose bodies are taken as the norm in research and risk assessment? And who is at the negoti-ating table when decisions are made on bans, exemptions and protective measures? Chemicals policy is not just a matter of limit values and lists of substances – it is a matter of health, social and gender justice, and human rights. At the first International Conference (IC1) of the Global Framework on Chemicals (GFC) in November 2026, a Gender Action Plan (GAP) is to be adopted – an important step to-wards the effective implementation of the GFC.

Who bears the risk? Patriarchy and unequal exposure to chemicals

Who is exposed to which chemicals, how these substances affect the body, and what options people have to protect themselves from them also depend on gender – not solely on biological sex. Equally decisive are social conditions such as working conditions, income, care work, consumption patterns, place of residence, and access to information, healthcare and political decision-making processes[i]. The term 'gender' is often used to describe these socially determined differences relating to sex.

The root cause of unequal conditions between genders continues to lie in patriarchal structures that are embedded in our societies, attitudes and behaviours. Resources, risks, care work and influence are unevenly distributed, and what is considered 'feminine' is (often) structurally devalued. This can affect women as well as people who are perceived as female or to whom roles and characteristics con-sidered feminine are attributed. As a result, they may, for example, be exposed to more stressful working conditions, have fewer re-sources at their disposal, or have less influence over decisions affecting their health and their protection from harmful chemicals.

This is particularly evident when it comes to chemicals in the work-place. Power relations in the workplace are closely linked to gender, social status and occupational roles, and have a direct impact on health. According to the International Labour Organisation (ILO), women worldwide are disproportionately represented in jobs where they come into regular contact with hazardous chemicals – for example, in the healthcare sector, the cleaning sector, agriculture, electronics manufacturing and the textile industry. The textile indus-try is a particularly striking example. In countries such as Cambodia, women account for around 80 to 90 per cent of the workforce. They work daily with dyes, solvents, resins, bleaching agents and numerous other chemicals.

Due to a lack of information about hazardous substances, these women are often exposed to high levels of chemicals without being sufficiently aware of the risks. Furthermore, protective equipment is often designed for male body sizes and therefore does not offer the same level of protection to other body types.

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The male body as the norm

The focus on the male body is also evident in research and risk assessment. For a long time, toxicological studies have predominantly used male bodies as a reference. Differences in, for example, the absorption, metabolism and effects of chemicals were studied less frequently in women and virtually never in gender-diverse bodies, or data was not collected separately by gender. The lack of gender-specific data – also known as the 'gender data gap' – is therefore not merely a scientific problem, but a manifestation of structural inequality. For if the male body is taken as the norm, limit values and protective measures are also based on it, whilst risks to other bodies remain inadequately addressed.

The gender data gap is particularly evident in the case of endocrine-disrupting chemicals (EDCs). Hormones play a central role in the gender-specific development and regulation of the body. Endocrine-disrupting chemicals can interfere with these sensitive processes and contribute to the development of diseases, particularly during sensitive phases such as puberty, pregnancy and the menopause. Biologically female bodies undergo more sensitive hormonal phases throughout their lives than male bodies, a factor that should be taken into account in the risk assessment of chemicals. In field studies in Kenya, female waste pickers reported unusually long menstrual cycles, which their gynaecologists linked to the high levels of chemical exposure they experience at work.[ii] If such gender-specific effects are not taken into account, specific health risks may be overlooked.

The Gender Action Plan – more than just an equality programme

The Gender Action Plan is intended to help ensure that differences in exposure and health risks are taken into account in the implementation of the GFC, that gaps in knowledge and data are closed, and that chemicals policy is shaped in a way that ensures equality. It is not merely a question of better protecting everyone from harmful substances, but of embedding gender equality as a hallmark of effective chemicals management across all areas of the GFC's implementation. The GAP is therefore more than an equality programme.

The mandate to develop a Gender Action Plan within the framework of the GFC is the result of intensive negotiations at ICCM 5 in Bonn in 2023. Resolution V/4 sets out a clear mandate to ensure the comprehensive, equal and effective participation of women in the GFC, as well as to systematically integrate gender-inclusive approaches.

The GFC explicitly refers to women as 'agents of change'. This represents an important shift in perspective: women are not merely regarded as those particularly affected, but their know-ledge, experiences and participation are recognised as part of the solution.

The draft Gender Action Plan[iii] now available further translates this mandate into practice. It focuses on specific risks faced by women and girls – for example, in relation to reproductive health or in high-risk sectors such as agriculture and manufacturing. The draft also provides for the integration of gender considerations into national implementation plans and the generation of gender-disaggregated data.

At the same time, it is about more than just protection: women should be given access to knowledge and resources so that they themselves can take on a leading role in sustainable chemicals management. Their role in decision-making processes should be strengthened and their equal participation in the development of policies and solutions improved. Defined indicators will measure progress, and funding for the relevant measures must be provided. The GAP therefore does not treat gender equality as an afterthought, but systematically integrates women and girls into chemicals and waste management – as those affected and as active participants.

Gender diversity in the GAP – opportunities and limitations

Whilst the collection of disaggregated data for men and women is now part of the discourse – at least in the form of calls for such data and in the current draft GAP – there is as yet no data whatsoever on the impact on intersex, trans and non-binary people[iv], and there is hardly any space for their perspectives in chemicals policy.

The draft GAP does not explicitly mention non-binary, trans or intersex bodies and identities. That said, the draft GAP opens up the possibility of moving beyond the traditional gender binary in its implementation, as it refers neutrally to 'gender' rather than explicitly to 'women' in most instances. At key points, however, the text does restrict itself to women within a binary gender framework, for example in the vision statement: "The vision of the GAP is to improve the full, equal and effective participation of women in decision-making processes." These are missed opportunities, largely attributable to the current backlash against gender equality policy and human rights.

A litmus test for IC1

With the Gender Action Plan emerging from a lengthy process of negotiation and work, IC1 will also determine whether the new framework lives up to its own claim to view chemicals management as a contribution to health, human rights and sustainable development.

The GAP is therefore not a mere side issue of the Global Framework on Chemicals. It is a key test of whether scientific findings on different levels of exposure and health risks are actually being translated into policy. Good chemicals policy must recognise what has long been overlooked – different levels of exposure, different realities of life and different opportunities for action[v]. It is precisely here that the opportunity presented by the Gender Action Plan lies: its consistent implementation would help make chemicals policy both fairer and more effective.

[i] United Nations (2024): Gender and hazardous substances. Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes. A/79/163, 16 July 2024.
[ii] WECF International (2023): Tackling Toxics, YouTube
[iii] UNEP/GFC (2026): Gender Action Plan of the Global Framework on Chemicals – For a Planet Free of Harm from Chemicals and Waste. Revised Draft.
[iv] Studies seem to be more concerned with EDCs as an explanation for gender fluidity rather than their health effects
[v] WECF (2021): Geschlechtergerechte Chemikalienpolitik