



Women engage for a common future

Submission to the

Hazardous chemicals – prohibiting production for export chemicals banned in the European Union

July 2023

Women Engage for a Common Future, WECF, is an international network of over 170 eco- feminist organizations who are active in 70 countries around the world. We are committed to building a healthy environment and moving towards a toxic free future for all. WECF's vision aligns with the goal set by the European Green Deal for a toxic-free environment and the zero-pollution ambition. WECF urges EU authorities to stop the export of toxic chemicals and pesticides to developing countries and should take the lead to stop such practices worldwide. Allowing differing levels of protection for EU and non-EU citizens is not only unethical but also contradicts principles of human rights.

WECF work is dedicated to strengthening global and national policies on chemicals and waste, especially from a gender perspective to achieve a better protection from harmful chemicals and strive to build within in our network, including the Women Major Group where WECF is a co-facilitator, a global movement for a future free from toxic substances. The United Nations General Assembly has recognized, through Resolution A/76/L.75, that the unsound management of chemicals and waste has negative implications for the effective enjoyment of human rights. These consequences are particularly felt by vulnerable populations, including women and girls. In our scoping studies undertaken amongst others in Nigeria, Kenya, Indonesia, and Tunisia¹ we found women, pregnant women and children suffering from diseases linked with harmful chemicals, also from those which use is restricted in Europe. Scientists as well as the World Health Organization associate exposure to hazardous chemicals with the development and increase in illnesses in women such as breast cancer, an increase in reproductive disorders. Chemical exposure is linked to developmental disorders in the embryo, preterm births, miscarriages, low birth weight, brain damage, birth defects and neurological diseases.

In many developing countries where the EU exports banned and restricted chemicals, there is a lack of basic national chemicals management systems. These countries are less equipped to handle the use of chemicals that have been deemed to pose unacceptable risks in the EU. Low- and middle-income countries are net importers of chemicals, often without adequately considering their health and environmental impacts. Stopping these exports would have multiple benefits, including protecting the environment, biodiversity, and the lives of women and of at-risk populations. Moreover, it would decrease the availability of hazardous chemicals and create stronger incentives for the adoption of safer alternatives. We learned from our case studies that especially women are agents of change in substituting the use of these chemicals with innovative technical and non-chemical and safe alternatives.

¹ WECF Tackling Toxics, 2022. Case studies Tunisia & Kenya, <https://www.wecf.org/wp-content/uploads/2023/05/Kenya-Tunisia-Scoping-Study-BRS-2022-English.pdf>

There is evidence e.g. in the agricultural sector that replacing hazardous pesticides with cost-effective alternatives can yield health, environmental, and biodiversity advantages without compromising crop yields. The chemical industry, however, frequently relies on unsubstantiated claims that reducing access to highly hazardous pesticides would threaten food security. In reality, farmers who lack the necessary knowledge and resources to manage the dangers associated with these chemicals are consistently exposed to harm. Acute pesticide poisonings affect around 385 million people annually, primarily in low- and middle-income countries where significant portions of the population are engaged in agriculture or reside in pesticide-use areas. According to the Pesticide Action Network, up to 85 percent of workers being involved in pesticide application on commercial farms and plantations are women. An estimated 30,000 women in Malaysia spray pesticides on an average of 262 days per year. In some countries, 85 per cent of pesticide applicators on commercial farms are women, often without protective clothing, working while being pregnant and lactating.² Even if women do not directly apply the pesticides, they mix pesticides, clean pesticide containers, wash pesticide-contaminated clothes, and store pesticides in their homes. They work, live, and raise their children in a toxic environment. Due to their thinner skin, they absorb pesticides more easily than men and the pesticide residues remain longer in female bodies because of their higher proportion of body fat. Many pesticides have endocrine-disrupting properties and are strongly linked for example to developing breast cancer, fertility problems.³

Disturbingly, in 2018 alone, over 81,000 tonnes of pesticides containing 41 different hazardous chemicals banned in the EU were exported from European factories for agricultural use in other countries.⁴ Allowing differing levels of protection for EU and non-EU citizens is not only unethical but also contradicts principles of human rights. IPEN where WECF is a member organisation has documented the widespread uncontrolled presence of these chemicals in exported products and materials. Once these chemicals and products become waste, they are often mismanaged, leading to unregulated toxic exposure.

Countries lacking resources and infrastructure face significant challenges in properly managing risks associated with toxic chemicals and pesticides. Even more: we urgently needed a process of an economic transition towards less production and use of chemicals in general, including those with toxic properties. The planetary boundary is already reached.

Alongside an export ban, the EU should fulfill its commitment outlined in the Chemical Strategy to promote due diligence in the production and use of chemicals. This can be achieved through the forthcoming sustainable corporate governance initiative, which should clarify that EU-based companies are prohibited from producing or selling toxic chemicals banned in the EU anywhere in the world.

WECF also calls the EU to support global processes aimed at ensuring worldwide controls on the manufacturing, use, and trade of hazardous chemicals. Examples of these processes include the SAICM Beyond 2020 initiative and the ongoing negotiations for a legally binding plastics treaty.

Munich, 31 July 2023

² [14] Watts Meriel (2012). Breast Cancer, Pesticides and you, PAN AP.

³ WHO & UNEP (2013). State of the Science on Endocrine Disrupting Chemicals - 2012

⁴ <https://eeb.org/european-commission-must-keep-to-its-green-deal-promise-and-ban-eu-exports-of-hazardous-chemicals/>

