



**Friends of
the Earth
Europe**

Brussels, 20 November 2006

Dear Member of the European Parliament,

The reverse of this letter is a spoof of an advertisement placed in the October 19th edition of the European Voice by Europe's chemical industry lobby group, CEFIC. We found their advert shocking and inappropriate as it presented a highly distorted view of the substitution of dangerous chemicals.

Amendments to the REACH chemicals legislation proposed by the Environment Committee of the European Parliament will not lead to an overnight ban on all hazardous chemicals as CEFIC implies. Highly dangerous substances (such as carcinogens or mutagens) will, in fact, still be authorised where safer alternatives are unavailable, where socio-economic benefits outweigh risks and where the chemical is assumed to be adequately controlled.

Using DDT as an emotive argument against substitution is misleading and cynical. DDT is a pesticide, so it is exempt from the scope of REACH. Therefore it is absurd to insinuate that the substitution principle under REACH would prevent the use of DDT against malaria. Pressure to use alternatives to DDT originates not from the REACH legislation, but from the international Stockholm Convention and from evidence that other approaches like public awareness campaigns and mosquito nets are preferable, because they are still effective but are not toxic and are much more affordable than DDT.

The REACH chemicals legislation is now at a final crossroads. With the substitution principle firmly enshrined in it, the new legislation would significantly improve upon the current, deficient system of chemicals management and would provide increased health and environmental protection. We urge you to support the substitution principle during the second reading vote - otherwise REACH will fail in all its original aims, undermined by CEFIC's flawed arguments.

We will contact you over next days to discuss this important matter.

Yours faithfully,

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**Yes, dangerous chemicals must be strictly controlled...
...but blanket mandatory substitution can do more harm than good!**

The proposals of the Environment Committee of the European Parliament for Authorisation under REACH are well intentioned but would in many cases force substitution of existing chemicals for others. This sounds progressive but it could do more harm than good.

A safe and realistic approach to substitution is the only way to deliver results. Substances must be authorised under adequate control or when benefits outweigh risks.

The real dilemma of substitution

Yes, DDT is a dangerous chemical and it was rightly banned for agricultural uses. And of course, the European chemical industry fully supports the Stockholm Convention banning Persistent Organic Pollutants (POPs)...

...but can we deny that it saves lives?

3,000 children and infants die every day from malaria. One of the best tools we have against malaria is indoor residual house spraying. Of the dozen insecticides WHO has approved as safe for house spraying, the most effective is DDT.

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Cefic calls on MEPs to vote for workable and safe legislation. Blanket mandatory substitution simply will not work.

More information and examples are available on www.cefic.eu/substitution

This is a copy of the original advertisement produced by Cefic and printed in the European Voice on 19th October 2006.