



The **ROCA (Rotterdam Convention Alliance)** is an Alliance of Environmental, Labour and Health organizations around the world working to promote the full and effective implementation of the Rotterdam Convention

International NGOs call on EU Commission, EU Parliament and EU Member States not to lower the health and safety standards in its EU PIC Regulation

ROCA Appeal regarding the Commission's proposed weakening of PIC Regulation 698/2008/EC

The right to Prior Informed Consent (PIC), as provided by the Rotterdam Convention, is an essential right, both to ensure responsible management of hazardous chemicals and pesticides and also to ensure that developing countries control how their environment is used in pursuit of sustainable development.

The EU is a leader in the implementation of the Rotterdam Convention and its objectives through the current EU PIC Regulation. Therefore we are very concerned about new proposals put forward by the EU Commission to weaken the EU PIC Regulation. These proposals would result in an increase in the export of hazardous chemicals to our countries, potential importing countries. Our countries often lack information and technical and financial resources to handle these chemicals. These proposals not only pose direct risk to human health and the environment in our countries, but also undermine the very purpose of the Convention.

We, as NGOs from potential importing countries, strongly call on EU politicians and decision makers to:

1. Withdraw the 2 exemptions mentioned in Article 14/7, which would allow continued exportation of the chemicals even if no response or notification permitting importation had been received after 60 days. Moreover, the proposal made by the Commission, states that the export would be allowed if the chemical has been used or imported in the last 5 years and no regulatory action has been undertaken to prohibit its use.

2. Support Amendment 5 to article 14/7 of rapporteur Dan Jorgensen to ensure inclusion in the substances excluded from PIC derogation regime of all categories of hazardous substances classified CMR 1A or 1B under CLP regulation or PBT/vPvB and endocrine disrupting substances under REACH regulation EC No 1906/2006.

3. Consider the inclusion in this list of article 14/7 of substances of Annex XIV (substances of very high concern) and substances of Candidate List of REACH regulation EC No 1906/2006.

We believe that the EU does not want to lower its standards to protect human health and the environment by inventing derogations aimed at increasing the export of dangerous chemicals/pesticides, which are banned, not authorized or severely restricted in the EU, to non-EU countries, especially developing countries and countries with economies in transition.

The proposed changes would increase environmental injustice by exposing populations of developing countries and countries with economies in transition to greater risk of harm.

We call on you to support environmental justice by maintaining or even enhancing the existing standards. Thank you for your support.

Signatories from Non-EU countries

Friends of the Earth, Malaysia
Ecological Restorations, Ghana
SEEPOM (Association d'Education Environnementale et de Protection des Oiseaux au Maroc, Morocco
Alaska Community Action on Toxics, Alaska
Eco Accord, Russia
Pesticide Action Network Aotearoa, New Zealand
Uganda Network on Toxic Free Malaria Control (UNETMAC), Uganda
ToxicsWatch Alliance, India
Asociation of Ecotoxicologist from Moldova, ECOTOX, Moldova
Journalists for Human Rights, Macedonia
CUTEZATORUL Association, Moldova
Association for Farmers Rights Defense, AFRD, Georgia
Terra-1530, Moldova
TOXISPHERA – Environmental Health Association, Brazil
APROMAC – Environmental Protection Association, Brazil
MAMA86, Ukraine
CAATA (Cener for Analyses on Toxics and Alternatives), Mexico
Indonesia Toxics-Free Network, Indonesia
Corporate Accountability Desk-The Other Media, India
"Khazer" Ecological and Cultural NGO, Armenia
AEEFG, Tunesia
Armenian Women for Health and Healthy Environment (AWHHE), Armenia
Sciencecorps, USA
Alliance Nationale des Consommateurs et de l'environnement (ANCE-Togo), Togo

Supporting signatories from EU countries

WEN, Scotland
Social Ecological Institute, Poland
Clean up Greece, Greece
WECF – Women in Europe for a Common Future, Germany, France, The Netherlands
VHUE e.V., Association for the Support of Environmental sick People, Germany
EU Umweltbüro, Austria
Réseau Environnement Santé (RES), France
Ecobaby Foundation, The Netherlands
Ban asbestos France et Association Henri Pézerat, France