



PERMANENT REPRESENTATION
OF SWEDEN
TO THE EUROPEAN UNION

Brussels, 27 October 2015

Brussels

Deputy Permanent Representative

Commissioner for Environment, Maritime
Affairs and Fisheries
Mr. Karmenu Vella

CABINET VELLA	
29 OCT. 2015	
Action:	AM
Info:	AB

**Letter from the Swedish Ministry of the Environment and Energy and
Swedish industries concerning hazardous substances in textiles**

Dear Commissioner,

Please find enclosed a letter from the Swedish Ministry of the
Environment and Energy as well as Swedish textile industries on the
abovementioned subject.

Yours faithfully,



Karmenu Vella,
Commissioner for Environment, Maritime
Affairs & Fisheries

Elżbieta Bieńkowska,
Commissioner for Internal Market, Industry,
Entrepreneurship and SMEs

Věra Jourová,
Commissioner for Justice, Consumers and
Gender Equality

Vytenis Andriukaitis
Commissioner for Health and Food Safety

Call for action to promote measures on hazardous substances in textiles

Dear Mr Vella, Ms Bieńkowska, Ms Jourová and Mr Andriukaitis,

We are writing to you concerning the use of hazardous substances in textiles and the risks to health and the environment posed by such substances. Textiles represent a broad category of products used in a way that may expose consumers, including children, directly to the chemicals they contain. Further efforts are needed to reduce the risks associated with chemicals we use in present-day society, and particularly hazardous substances need to be phased out in textiles.

Common rules need to be further developed at the European level. Today several Swedish companies have their own, voluntary, restrictions and information measures well beyond current legislation and believe the time has come to take action at the European level.

Common rules in the EU would bring substantial benefits for businesses, consumers and the environment. Producers will know from the start which rules apply and anyone following these rules will gain access to the entire European market. Common rules would provide a level playing field, allowing companies to compete on equal terms and at the same time reduce the risks to human health and the environment. We therefore urge the commission to develop common rules on restriction of chemicals in textiles. Taking action to limit hazardous substances in textiles could also create synergies between chemicals legislation and the Water framework Directive as well as contributing to achieve the Sustainable Development Goals. Taking action would also be in line with the precautionary principle detailed in the Treaty of the functioning of the European Union.

CMR-substances

Substances that are carcinogenic, mutagenic and toxic for reproduction (CMR) should not be present in articles in close contact with consumers. We therefore support the work initiated by the Commission to consider using article 68.2 in the REACH Regulation (EG) No 1907/2006, to restrict relevant and listed CMR:s in textiles and welcome the public consultation which was recently launched by the commission on this subject. We would like to point out that there may be a need to

review the information to be provided in the safety data sheets on substances in mixtures to enable textile manufacturers to comply with a restriction on CMRs in textiles.

Garments treated with antibacterial substances

Biocides are often toxic and designed to prevent or control different organisms. Such substances must be used with caution. According to the Biocidal Products Regulation, use of biocidal products must be limited to a minimum. Therefore, there is reason to weigh the necessity of antibacterial treatment of textiles against the risk that may arise. There are concerns that biocidal use may contribute to the development of resistant bacteria and the development of cross-resistance to antibiotics, which in turn can lead to intractable diseases. Antibacterial treatment of textiles is often washed out, the effectiveness and necessity is questionable, especially considering that resistance to antibiotics according to the WHO is one of the greatest threats to humanity. In addition to the environmental aspects, there is also concern over direct exposure of children who might suck on biocide-treated clothing. Resistance to antibiotics is a serious problem and increasing attention is being paid to this issue by authorities around the world. In Sweden several companies have taken initiatives to phase out garments treated with antibacterial substances. According to article 18 in the Biocidal Product regulation the Commission shall report on the need to introduce additional measures, to reduce the risks posed to human health, animal health and the environment by biocidal products. We urge the commission to propose measures to prevent unnecessary use of antibacterial substances in textiles.

Poly - and perfluorinated alkylated substances

We are concerned about the widespread use of highly fluorinated chemicals, called PFAS (poly - and perfluorinated alkylated substances) in products. We would therefore like to draw the Commissions attention to the potential environment and health risks linked to the use of PFAS and the need for an EU Action Plan which includes an overall assessment of the risks and measures needed for the whole group of substances. The plan should include measures to avoid unnecessary use in textiles. Several Swedish garment companies have already introduced voluntary measures to phase out the use of PFAS and we believe it is important that others follow. Furthermore, The Swedish Chemicals Agency has been commissioned by the government to propose a national action plan for highly fluorinated chemicals.

PFAS include thousands of chemicals and have become widespread in our society through use in a large number of consumer products. All perfluorinated substances are extremely persistent in the environment and some are bio-accumulative and toxic. A number of PFAS have been identified as substances of very high concern under Reach and have thus been added to the candidate list. Other highly fluorinated and persistent substances are introduced as substitutes, some of these have been detected in both the environment and in human blood. Basic knowledge is limited on the potential hazardous properties of most of the substances in this group. There is a risk of serious long-term problems if these persistent and widespread substances prove to have hazardous properties. We therefore see a need to develop an action plan at the European level for highly fluorinated substances.

Stockholm, 23 October 2015

Yours sincerely,

MINISTRY OF THE ENVIRONMENT AND ENERGY
Åsa Romson, Minister for Climate and the Environment

FILIPPA K

HAGLOFS

H&M

HOUDINI

INDISKA

IKEA GROUP

KAPPAHL

LINDEX

RNB RETAIL AND BRANDS

ÅHLÉNS AB

**INTERNATIONAL CHEMICALS SECRETARIAT,
ChemSec**

SWEDISH CONSUMERS ASSOCIATION

SWEDISH TRADE FEDERATION

**THE SWEDISH WATER AND WASTE WATER
ASSOCIATION**

SWEREA IVF

**TEKO, SWEDISH TEXTILE AND CLOTHING
INDUSTRIES' ASSOCIATION**

