

Parlement européen  
Bât. Altiero Spinelli 08H353  
60, rue Wiertz / Wiertzstraat 60  
B-1047 Bruxelles/Brussel

Dear Ms. Ries MEP,

The undersigned NGOs are writing to you to request your support for reducing menstrual poverty, minimizing exposure to hazardous substances as well as reducing plastic use and single-use plastic pollution in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*. As the rapporteur for the file and a woman, we request your support in changing Articles 1, 6, 7 and 10 of the proposal. In particular, we urge you to support measures to promote healthy reusable alternatives to single-use plastic menstrual items.

Menstrual products (pads, tampons, tampon applicators, etc) are one of the most commonly found single-use plastic items in the marine environment; indeed, the European Commission ranks them the fifth most common<sup>1</sup>.

At the same time, half the world's population needs menstrual products to lead a decent life. The costs of buying single-use plastic menstrual products over a woman's lifetime vary significantly depending on the EU country, but estimates range from over 1,500<sup>2</sup> to 7,500<sup>3</sup> euros. On the other hand, research shows that using reusable alternatives represents 6% of the costs of disposable menstrual products over a lifetime<sup>4 5</sup>. With an average gender pay gap of 16% across the EU<sup>6</sup>, any measure that contributes to a significant reduction in the amount a woman spends managing her period is vital<sup>7</sup>.

Despite this, the Commission fails to use this proposal to improve the lives of women and girls. This needs to change so that:

- Women and girls in Europe's poorest communities are not excluded any longer from participating fully in society because of their periods.
- The Parliament takes a stand in fighting menstrual poverty by supporting widespread availability of safe reusable menstrual products, in particular in large retailers and pharmacies across the EU. That this is accompanied with awareness raising measures on alternatives to single-use menstrual products.

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<sup>1</sup> European Commission (2018) *Impact Assessment Proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment*, page 11, [http://ec.europa.eu/environment/circular-economy/pdf/single-use\\_plastics\\_impact\\_assessment.pdf](http://ec.europa.eu/environment/circular-economy/pdf/single-use_plastics_impact_assessment.pdf)

<sup>2</sup> <https://www.mooncup.co.uk/why-mooncup/why-should-i-use-a-menstrual-cup/>

<sup>3</sup> [https://www.huffingtonpost.co.uk/2015/09/03/women-spend-thousands-on-periods-tampon-tax\\_n\\_8082526.html](https://www.huffingtonpost.co.uk/2015/09/03/women-spend-thousands-on-periods-tampon-tax_n_8082526.html)

Own calculation: £13 per month, €14.5 per month (conversion August 2018), €174 per year, making a total of €7,482 over a period of 43 years of having the period (from 12 to 55 years of age).

<sup>4</sup> <http://www.isonomia.co.uk/?p=4912>

<sup>5</sup> Menstrual cups cost about 30 euros per pair; the expected lifetime of each is 10 years. <https://www.thecupeffect.org/why-we-exist/>

<sup>6</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender\\_pay\\_gap\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics)

<sup>7</sup> The women's rights movement calls on governments to recognise menstrual hygiene as a basic need and right. As such, all EU member states should be encouraged to make use of the VAT Directive that allows national governments to eliminate VAT on menstrual products. This is important to ensure that the single-use plastic directive does not lead to a disproportionate burden on women menstruating by causing an increase in costs. India has scrapped its tax on menstrual hygiene products (<https://www.independent.co.uk/news/world/asia/india-sanitary-pads-12-tax-protests-period-poverty-piyush-goyal-a8459801.html>), Australia is about to scrap theirs, and so should all EU member states.

- Women are not exposed to hazardous substances in menstrual products that are linked to well-known types of cancer and organ malfunction<sup>8</sup>.
- Promoting the replacement of single-use plastic menstrual items with reusable ones curbs single-use plastic pollution.

Article 1 (on the objective of the Directive), Article 6 (on product requirements), Article 7 (on marking requirements) and Article 10 (on awareness raising measures) of the current proposal offer an excellent opportunity to fight all of the above points, and we would like you to support the following changes:

- Article 1 should be amended in order to ensure that:
  - The objective of the Directive includes transitioning to a non-toxic circular economy; and
  - The Directive aims to achieve a reduction in the consumption of single-use plastics through sustainable business models, as well as non-toxic products and materials, thus also contributing to the efficient functioning of the internal market.
- Article 6 should be complemented in order to ensure that:
  - The product requirements for all products referred to in the Directive prevent the use of hazardous chemicals in their composition.
- Article 7 on marking requirements should be amended so that:
  - All the product information listed in Article 7 is provided to consumers (not allowing manufacturers to pick their preferred one);
  - A new point is added, on the provision of information on the availability of existing reusable alternatives (such as reusable cups or pads); and
  - A new point is added on the presence of chemical components meeting the properties of Article 57 of Regulation 1907/2006 or which have been identified in accordance with the procedure described in Article 59(1), of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).
- Finally, Article 10 should be complemented so that:
  - Measures are implemented to inform consumers of the risks of the chemical components and additives in plastics on human health; and
  - Reusable menstrual products are made widely available in each Member State, in particular in large retailers and pharmacies; and awareness-raising measures on alternatives to single-use menstrual products are implemented, including through school programmes.

This is an opportunity for MEPs to champion women's issues ahead of the elections by ensuring that women have access to cheap and toxic-free reusable menstrual alternatives will show that MEPs take women's well-being and environmental protection seriously.

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<sup>8</sup> <https://hej-support.org/together-for-toxic-and-plastic-free-periods/>

#breakfreefromplastic

Economies, societies and citizens are ready – and are even demanding – to change their relationship with plastic and to take bold action to eliminate plastic pollution<sup>9</sup>. Adopting the changes in the legislation described above will have a direct, positive impact on women's lives, will help achieve a reduction of plastic pollution and will create new business opportunities for EU companies. We, and countless Europeans, are counting on you to bring about the change we all want to see.

If you would like more information or have questions on the points above, we would be delighted to meet with you in the coming weeks.

Yours sincerely,



Joan Marc Simon

Director, Zero Waste Europe



Alexandra Caterbow

Co-Director, HEJSupport



On behalf of the organisations listed below:

**SIGNATORIES:**



<sup>9</sup> Over 90% of citizens highlighted this in a Eurobarometer poll (European Commission, 2014, Attitudes of Europeans towards Waste Management and Resource Efficiency, Flash Eurobarometer 388; [http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl\\_388\\_en.pdf](http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf)) and almost 700,000 citizens signed a petition (<https://act.wemove.eu/campaigns/483>) asking for action at the EU level.

#breakfreefromplastic



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**GREENPEACE**

**SUPPORTERS:**

natracare® eco ♻️ femme

**Annex: Suggested amendments to the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment***

The following amendments seek to ensure that measures to promote healthy reusable alternatives to single-use plastic menstrual items are introduced in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*.

**Article 1 - Objectives**

The objective of this Directive is to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a circular economy with innovative business models, products and materials, thus also contributing to the efficient functioning of the internal market.

The objective of this Directive is to prevent and reduce the impact of ~~certain-plastics products~~ on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a **non-toxic** circular economy ***through a reduction in consumption of single use plastics***, ~~with innovative~~ **with sustainable** business models, **non-toxic** products and materials, thus also contributing to the efficient functioning of the internal market.

**Article 6 - Product requirements**

New

***5. Member States shall ensure that the product requirements for all products referred to in this Directive shall prevent the use of hazardous chemicals in their composition.***

**Article 7 - Marking requirements**

1. Member States shall ensure that each single-use plastic product listed in Part D of the Annex placed on the market bears a conspicuous, clearly legible and indelible marking informing consumers of one or more of the following:

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**Article 7 - Marking requirements**

(c) the presence of plastics in the product.

(c) the presence of plastics in the product ***and, where applicable, the availability of alternatives;***

**Article 7 - Marking requirements**

New

***ca) the presence in the product of components meeting the properties of Article 57 of Regulation 1907/2006 or that have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).***

**Article 10 - Awareness raising measures**

New, Article 10 sentence 2

***Member States shall ensure that reusable menstrual products are made available widely in their territory, in particular in large retailers and pharmacies; and carry out awareness raising measures on alternatives to single-use menstrual products, including through school programmes.***

Parlement européen  
Bât. Altiero Spinelli 14E242  
60, rue Wiertz / Wiertzstraat 60  
B-1047 Bruxelles/Brussel

Dear Mr. Florenz MEP,

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Menstrual products (pads, tampons, tampon applicators, etc) are one of the most commonly found single-use plastic items in the marine environment; indeed, the European Commission ranks them the fifth most common<sup>10</sup>.

At the same time, half the world's population needs menstrual products to lead a decent life. The costs of buying single-use plastic menstrual products over a woman's lifetime vary significantly depending on the EU country, but estimates range from over 1,500<sup>11</sup> to 7,500<sup>12</sup> euros. On the other hand, research shows that using reusable alternatives represents 6% of the costs of disposable menstrual products over a lifetime<sup>13 14</sup>. With an average gender pay gap of 16% across the EU<sup>15</sup>, any measure that contributes to a significant reduction in the amount a woman spends managing her period is vital<sup>16</sup>.

Despite this, the Commission fails to use this proposal to improve the lives of women and girls. This needs to change so that:

- Women and girls in Europe's poorest communities are not excluded any longer from participating fully in society because of their periods.
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<sup>16</sup> The women's rights movement calls on governments to recognise menstrual hygiene as a basic need and right. As such, all EU member states should be encouraged to make use of the VAT Directive that allows national governments to eliminate VAT on menstrual products. This is important to ensure that the single-use plastic directive does not lead to a disproportionate burden on women menstruating by causing an increase in costs. India has scrapped its tax on menstrual hygiene products (<https://www.independent.co.uk/news/world/asia/india-sanitary-pads-12-tax-protests-period-poverty-piyush-goyal-a8459801.html>), Australia is about to scrap theirs, and so should all EU member states.



That this is accompanied with awareness raising measures on alternatives to single-use menstrual products.

- Women are not exposed to hazardous substances in menstrual products that are linked to well-known types of cancer and organ malfunction<sup>17</sup>.
- Promoting the replacement of single-use plastic menstrual items with reusable ones curbs single-use plastic pollution.

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This is an opportunity for MEPs to champion women's issues ahead of the elections by ensuring that women have access to cheap and toxic-free reusable menstrual alternatives will show that MEPs take women's well-being and environmental protection seriously.

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Economies, societies and citizens are ready – and are even demanding – to change their relationship with plastic and to take bold action to eliminate plastic pollution<sup>18</sup>. Adopting the changes in the legislation described above will have a direct, positive impact on women's lives, will help achieve a reduction of plastic pollution and will create new business opportunities for EU companies. We, and countless Europeans, are counting on you to bring about the change we all want to see.

If you would like more information or have questions on the points above, we would be delighted to meet with you in the coming weeks.

Yours sincerely,



Joan Marc Simon

Director, Zero Waste Europe



Alexandra Caterbow

Co-Director, HEJSupport



On behalf of the organisations listed below:

**SIGNATORIES:**



<sup>18</sup> Over 90% of citizens highlighted this in a Eurobarometer poll (European Commission, 2014, Attitudes of Europeans towards Waste Management and Resource Efficiency, Flash Eurobarometer 388; [http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl\\_388\\_en.pdf](http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf)) and almost 700,000 citizens signed a petition (<https://act.wemove.eu/campaigns/483>) asking for action at the EU level.

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Hnutí DUHA



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**GREENPEACE**

**SUPPORTERS:**

natracare® eco ♻️ femme

**Annex: Suggested amendments to the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment***

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**Article 6 - Product requirements**

New

***5. Member States shall ensure that the product requirements for all products referred to in this Directive shall prevent the use of hazardous chemicals in their composition.***

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**Article 7 - Marking requirements**

New

***ca) the presence in the product of components meeting the properties of Article 57 of Regulation 1907/2006 or that have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).***

**Article 10 - Awareness raising measures**

New, Article 10 sentence 2

***Member States shall ensure that reusable menstrual products are made available widely in their territory, in particular in large retailers and pharmacies; and carry out awareness raising measures on alternatives to single-use menstrual products, including through school programmes***

Parlement européen  
Bât. Altiero Spinelli 15G318  
60, rue Wiertz / Wiertzstraat 60  
B-1047 Bruxelles/Brussel

Dear Mr. Paolucci MEP,

The undersigned NGOs are writing to you to request your support for reducing menstrual poverty, minimizing exposure to hazardous substances as well as reducing plastic use and single-use plastic pollution in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*. As the S&D shadow rapporteur for the file, we request your support in changing Articles 1, 6, 7 and 10 of the proposal. In particular, we urge you to support measures to promote healthy reusable alternatives to single-use plastic menstrual items.

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Despite this, the Commission fails to use this proposal to improve the lives of women and girls. This needs to change so that:

- Women and girls in Europe's poorest communities are not excluded any longer from participating fully in society because of their periods.
- The Parliament takes a stand in fighting menstrual poverty by supporting widespread availability of safe reusable menstrual products, in particular in large retailers and pharmacies across the EU. That this is accompanied with awareness raising measures on alternatives to single-use menstrual products.

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Director, Zero Waste Europe



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Hnutí DUHA



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Dear Mr. Demesmaeker MEP,

The undersigned NGOs are writing to you to request your support for reducing menstrual poverty, minimizing exposure to hazardous substances as well as reducing plastic use and single-use plastic pollution in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*. As the ECR shadow rapporteur for the file, we request your support in changing Articles 1, 6, 7 and 10 of the proposal. In particular, we urge you to support measures to promote healthy reusable alternatives to single-use plastic menstrual items.

Menstrual products (pads, tampons, tampon applicators, etc) are one of the most commonly found single-use plastic items in the marine environment; indeed, the European Commission ranks them the fifth most common<sup>28</sup>.

At the same time, half the world's population needs menstrual products to lead a decent life. The costs of buying single-use plastic menstrual products over a woman's lifetime vary significantly depending on the EU country, but estimates range from over 1,500<sup>29</sup> to 7,500<sup>30</sup> euros. On the other hand, research shows that using reusable alternatives represents 6% of the costs of disposable menstrual products over a lifetime<sup>31 32</sup>. With an average gender pay gap of 16% across the EU<sup>33</sup>, any measure that contributes to a significant reduction in the amount a woman spends managing her period is vital<sup>34</sup>.

Despite this, the Commission fails to use this proposal to improve the lives of women and girls. This needs to change so that:

- Women and girls in Europe's poorest communities are not excluded any longer from participating fully in society because of their periods.
- The Parliament takes a stand in fighting menstrual poverty by supporting widespread availability of safe reusable menstrual products, in particular in large retailers and pharmacies across the EU. That this is accompanied with awareness raising measures on alternatives to single-use menstrual products.

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<sup>28</sup> European Commission (2018) *Impact Assessment Proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment*, page 11, [http://ec.europa.eu/environment/circular-economy/pdf/single-use\\_plastics\\_impact\\_assessment.pdf](http://ec.europa.eu/environment/circular-economy/pdf/single-use_plastics_impact_assessment.pdf)

<sup>29</sup> <https://www.mooncup.co.uk/why-mooncup/why-should-i-use-a-menstrual-cup/>

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<sup>31</sup> <http://www.isonomia.co.uk/?p=4912>

<sup>32</sup> Menstrual cups cost about 30 euros per pair; the expected lifetime of each is 10 years. <https://www.thecupeffect.org/why-we-exist/>

<sup>33</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender\\_pay\\_gap\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics)

<sup>34</sup> The women's rights movement calls on governments to recognise menstrual hygiene as a basic need and right. As such, all EU member states should be encouraged to make use of the VAT Directive that allows national governments to eliminate VAT on menstrual products. This is important to ensure that the single-use plastic directive does not lead to a disproportionate burden on women menstruating by causing an increase in costs. India has scrapped its tax on menstrual hygiene products (<https://www.independent.co.uk/news/world/asia/india-sanitary-pads-12-tax-protests-period-poverty-piyush-goyal-a8459801.html>), Australia is about to scrap theirs, and so should all EU member states.

- Women are not exposed to hazardous substances in menstrual products that are linked to well-known types of cancer and organ malfunction<sup>35</sup>.
- Promoting the replacement of single-use plastic menstrual items with reusable ones curbs single-use plastic pollution.

Article 1 (on the objective of the Directive), Article 6 (on product requirements), Article 7 (on marking requirements) and Article 10 (on awareness raising measures) of the current proposal offer an excellent opportunity to fight all of the above points, and we would like you to support the following changes:

- Article 1 should be amended in order to ensure that:
  - The objective of the Directive includes transitioning to a non-toxic circular economy; and
  - The Directive aims to achieve a reduction in the consumption of single-use plastics through sustainable business models, as well as non-toxic products and materials, thus also contributing to the efficient functioning of the internal market.
- Article 6 should be complemented in order to ensure that:
  - The product requirements for all products referred to in the Directive prevent the use of hazardous chemicals in their composition.
- Article 7 on marking requirements should be amended so that:
  - All the product information listed in Article 7 is provided to consumers (not allowing manufacturers to pick their preferred one);
  - A new point is added, on the provision of information on the availability of existing reusable alternatives (such as reusable cups or pads); and
  - A new point is added on the presence of chemical components meeting the properties of Article 57 of Regulation 1907/2006, or which have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).
- Finally, Article 10 should be complemented so that:
  - Measures are implemented to inform consumers of the risks of the chemical components and additives in plastics on human health; and
  - Reusable menstrual products are made widely available in each Member State, in particular in large retailers and pharmacies; and awareness-raising measures on alternatives to single-use menstrual products are implemented, including through school programmes.

This is an opportunity for MEPs to champion women's issues ahead of the elections by ensuring that women have access to cheap and toxic-free reusable menstrual alternatives will show that MEPs take women's well-being and environmental protection seriously.

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<sup>35</sup> <https://hej-support.org/together-for-toxic-and-plastic-free-periods/>

#breakfreefromplastic

Economies, societies and citizens are ready – and are even demanding – to change their relationship with plastic and to take bold action to eliminate plastic pollution<sup>36</sup>. Adopting the changes in the legislation described above will have a direct, positive impact on women's lives, will help achieve a reduction of plastic pollution and will create new business opportunities for EU companies. We, and countless Europeans, are counting on you to bring about the change we all want to see.

If you would like more information or have questions on the points above, we would be delighted to meet with you in the coming weeks.

Yours sincerely,



Joan Marc Simon

Director, Zero Waste Europe



Alexandra Caterbow

Co-Director, HEJSupport



On behalf of the organisations listed below:

**SIGNATORIES:**



<sup>36</sup> Over 90% of citizens highlighted this in a Eurobarometer poll (European Commission, 2014, Attitudes of Europeans towards Waste Management and Resource Efficiency, Flash Eurobarometer 388; [http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl\\_388\\_en.pdf](http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf)) and almost 700,000 citizens signed a petition (<https://act.wemove.eu/campaigns/483>) asking for action at the EU level.



#breakfreefromplastic



**Hnutí DUHA**



#break**free**fromplastic



**GREENPEACE**

**SUPPORTERS:**

natracare® eco ♻️ femme

**Annex: Suggested amendments to the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment***

The following amendments seek to ensure that measures to promote healthy reusable alternatives to single-use plastic menstrual items are introduced in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*.

**Article 1 - Objectives**

The objective of this Directive is to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a circular economy with innovative business models, products and materials, thus also contributing to the efficient functioning of the internal market.

The objective of this Directive is to prevent and reduce the impact of ~~certain-plastics products~~ on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a **non-toxic** circular economy ***through a reduction in consumption of single use plastics***, ~~with innovative~~ **with sustainable** business models, **non-toxic** products and materials, thus also contributing to the efficient functioning of the internal market.

**Article 6 - Product requirements**

New

***5. Member States shall ensure that the product requirements for all products referred to in this Directive shall prevent the use of hazardous chemicals in their composition.***

**Article 7 - Marking requirements**

1. Member States shall ensure that each single-use plastic product listed in Part D of the Annex placed on the market bears a conspicuous, clearly legible and indelible marking informing consumers of one or more of the following:

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**Article 7 - Marking requirements**

(c) the presence of plastics in the product.

(c) the presence of plastics in the product ***and, where applicable, the availability of alternatives;***

**Article 7 - Marking requirements**

New

***ca) the presence in the product of components meeting the properties of Article 57 of Regulation 1907/2006 or that have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).***

**Article 10 - Awareness raising measures**

New, Article 10 sentence 2

***Member States shall ensure that reusable menstrual products are made available widely in their territory, in particular in large retailers and pharmacies; and carry out awareness raising measures on alternatives to single-use menstrual products, including through school programmes.***

Parlement européen  
Bât. Willy Brandt 02M113  
60, rue Wiertz / Wiertzstraat 60  
B-1047 Bruxelles/Brussel

Dear Ms. Boylan MEP,

The undersigned NGOs are writing to you to request your support for reducing menstrual poverty, minimizing exposure to hazardous substances as well as reducing plastic use and single-use plastic pollution in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*. As the GUE/NGL shadow rapporteur for the file and a woman, we request your support in changing Articles 1, 6, 7 and 10 of the proposal. In particular, we urge you to support measures to promote healthy reusable alternatives to single-use plastic menstrual items.

Menstrual products (pads, tampons, tampon applicators, etc) are one of the most commonly found single-use plastic items in the marine environment; indeed, the European Commission ranks them the fifth most common<sup>37</sup>.

At the same time, half the world's population needs menstrual products to lead a decent life. The costs of buying single-use plastic menstrual products over a woman's lifetime vary significantly depending on the EU country, but estimates range from over 1,500<sup>38</sup> to 7,500<sup>39</sup> euros. On the other hand, research shows that using reusable alternatives represents 6% of the costs of disposable menstrual products over a lifetime<sup>40 41</sup>. With an average gender pay gap of 16% across the EU<sup>42</sup>, any measure that contributes to a significant reduction in the amount a woman spends managing her period is vital<sup>43</sup>.

Despite this, the Commission fails to use this proposal to improve the lives of women and girls. This needs to change so that:

- Women and girls in Europe's poorest communities are not excluded any longer from participating fully in society because of their periods.
- The Parliament takes a stand in fighting menstrual poverty by supporting widespread availability of safe reusable menstrual products, in particular in large retailers and pharmacies across the EU. That this is accompanied with awareness raising measures on alternatives to single-use menstrual products.

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<sup>38</sup> <https://www.mooncup.co.uk/why-mooncup/why-should-i-use-a-menstrual-cup/>

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<sup>43</sup> The women's rights movement calls on governments to recognise menstrual hygiene as a basic need and right. As such, all EU member states should be encouraged to make use of the VAT Directive that allows national governments to eliminate VAT on menstrual products. This is important to ensure that the single-use plastic directive does not lead to a disproportionate burden on women menstruating by causing an increase in costs. India has scrapped its tax on menstrual hygiene products (<https://www.independent.co.uk/news/world/asia/india-sanitary-pads-12-tax-protests-period-poverty-piyush-goyal-a8459801.html>), Australia is about to scrap theirs, and so should all EU member states.

- Women are not exposed to hazardous substances in menstrual products that are linked to well-known types of cancer and organ malfunction<sup>44</sup>.
- Promoting the replacement of single-use plastic menstrual items with reusable ones curbs single-use plastic pollution.

Article 1 (on the objective of the Directive), Article 6 (on product requirements), Article 7 (on marking requirements) and Article 10 (on awareness raising measures) of the current proposal offer an excellent opportunity to fight all of the above points, and we would like you to support the following changes:

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This is an opportunity for MEPs to champion women's issues ahead of the elections by ensuring that women have access to cheap and toxic-free reusable menstrual alternatives will show that MEPs take women's well-being and environmental protection seriously.

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<sup>44</sup> <https://hej-support.org/together-for-toxic-and-plastic-free-periods/>

#breakfreefromplastic

Economies, societies and citizens are ready – and are even demanding – to change their relationship with plastic and to take bold action to eliminate plastic pollution<sup>45</sup>. Adopting the changes in the legislation described above will have a direct, positive impact on women's lives, will help achieve a reduction of plastic pollution and will create new business opportunities for EU companies. We, and countless Europeans, are counting on you to bring about the change we all want to see.

If you would like more information or have questions on the points above, we would be delighted to meet with you in the coming weeks.

Yours sincerely,



Joan Marc Simon

Director, Zero Waste Europe



Alexandra Caterbow

Co-Director, HEJSupport



On behalf of the organisations listed below:

**SIGNATORIES:**



<sup>45</sup> Over 90% of citizens highlighted this in a Eurobarometer poll (European Commission, 2014, Attitudes of Europeans towards Waste Management and Resource Efficiency, Flash Eurobarometer 388; [http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl\\_388\\_en.pdf](http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf)) and almost 700,000 citizens signed a petition (<https://act.wemove.eu/campaigns/483>) asking for action at the EU level.

#breakfreefromplastic



Hnutí DUHA





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**GREENPEACE**

**SUPPORTERS:**

**natracare** eco ♻️ femme

## **Annex: Suggested amendments to the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment***

The following amendments seek to ensure that measures to promote healthy reusable alternatives to single-use plastic menstrual items are introduced in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*.

### **Article 1 - Objectives**

The objective of this Directive is to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a circular economy with innovative business models, products and materials, thus also contributing to the efficient functioning of the internal market.

The objective of this Directive is to prevent and reduce the impact of ~~certain-plastics products~~ on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a **non-toxic** circular economy ***through a reduction in consumption of single use plastics***, ~~with innovative~~ **with sustainable** business models, **non-toxic** products and materials, thus also contributing to the efficient functioning of the internal market.

### **Article 6 - Product requirements**

New

***5. Member States shall ensure that the product requirements for all products referred to in this Directive shall prevent the use of hazardous chemicals in their composition.***

### **Article 7 - Marking requirements**

1. Member States shall ensure that each single-use plastic product listed in Part D of the Annex placed on the market bears a conspicuous, clearly legible and indelible marking informing consumers of one or more of the following:

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**Article 7 - Marking requirements**

(c) the presence of plastics in the product.

(c) the presence of plastics in the product ***and, where applicable, the availability of alternatives;***

**Article 7 - Marking requirements**

New

***ca) the presence in the product of components meeting the properties of Article 57 of Regulation 1907/2006 or that have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).***

**Article 10 - Awareness raising measures**

New, Article 10 sentence 2

***Member States shall ensure that reusable menstrual products are made available widely in their territory, in particular in large retailers and pharmacies; and carry out awareness raising measures on alternatives to single-use menstrual products, including through school programmes.***

Parlement européen  
Bât. Altiero Spinelli 04F358  
60, rue Wiertz / Wiertzstraat 60  
B-1047 Bruxelles/Brussel

Dear Ms. Auken MEP,

The undersigned NGOs are writing to you to request your support for reducing menstrual poverty, minimizing exposure to hazardous substances as well as reducing plastic use and single-use plastic pollution in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*. As the Greens/EFA shadow rapporteur for the file and a woman, we request your support in changing Articles 1, 6, 7 and 10 of the proposal. In particular, we urge you to support measures to promote healthy reusable alternatives to single-use plastic menstrual items.

Menstrual products (pads, tampons, tampon applicators, etc) are one of the most commonly found single-use plastic items in the marine environment; indeed, the European Commission ranks them the fifth most common<sup>46</sup>.

At the same time, half the world's population needs menstrual products to lead a decent life. The costs of buying single-use plastic menstrual products over a woman's lifetime vary significantly depending on the EU country, but estimates range from over 1,500<sup>47</sup> to 7,500<sup>48</sup> euros. On the other hand, research shows that using reusable alternatives represents 6% of the costs of disposable menstrual products over a lifetime<sup>49 50</sup>. With an average gender pay gap of 16% across the EU<sup>51</sup>, any measure that contributes to a significant reduction in the amount a woman spends managing her period is vital<sup>52</sup>.

Despite this, the Commission fails to use this proposal to improve the lives of women and girls. This needs to change so that:

- Women and girls in Europe's poorest communities are not excluded any longer from participating fully in society because of their periods.
- The Parliament takes a stand in fighting menstrual poverty by supporting widespread availability of safe reusable menstrual products, in particular in large retailers and pharmacies across the EU. That this is accompanied with awareness raising measures on alternatives to single-use menstrual products.

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Yours sincerely,



Joan Marc Simon

Director, Zero Waste Europe



Alexandra Caterbow

Co-Director, HEJSupport



On behalf of the organisations listed below:

**SIGNATORIES:**



<sup>54</sup> Over 90% of citizens highlighted this in a Eurobarometer poll (European Commission, 2014, Attitudes of Europeans towards Waste Management and Resource Efficiency, Flash Eurobarometer 388; [http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl\\_388\\_en.pdf](http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf)) and almost 700,000 citizens signed a petition (<https://act.wemove.eu/campaigns/483>) asking for action at the EU level.

#breakfreefromplastic



Hnutí DUHA



#break**free**fromplastic



**GREENPEACE**

**SUPPORTERS:**

natracare® eco ♻️ femme



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**Article 7 - Marking requirements**

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New, Article 10 sentence 2

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Parlement européen  
Bât. Altiero Spinelli 07H141  
60, rue Wiertz / Wiertzstraat 60  
B-1047 Bruxelles/Brussel

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The undersigned NGOs are writing to you to request your support for reducing menstrual poverty, minimizing exposure to hazardous substances as well as reducing plastic use and single-use plastic pollution in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*. As the EFDD shadow rapporteur for the file, we request your support in changing Articles 1, 6, 7 and 10 of the proposal. In particular, we urge you to support measures to promote healthy reusable alternatives to single-use plastic menstrual items.

Menstrual products (pads, tampons, tampon applicators, etc) are one of the most commonly found single-use plastic items in the marine environment; indeed, the European Commission ranks them the fifth most common<sup>55</sup>.

At the same time, half the world's population needs menstrual products to lead a decent life. The costs of buying single-use plastic menstrual products over a woman's lifetime vary significantly depending on the EU country, but estimates range from over 1,500<sup>56</sup> to 7,500<sup>57</sup> euros. On the other hand, research shows that using reusable alternatives represents 6% of the costs of disposable menstrual products over a lifetime<sup>58 59</sup>. With an average gender pay gap of 16% across the EU<sup>60</sup>, any measure that contributes to a significant reduction in the amount a woman spends managing her period is vital<sup>61</sup>.

Despite this, the Commission fails to use this proposal to improve the lives of women and girls. This needs to change so that:

- Women and girls in Europe's poorest communities are not excluded any longer from participating fully in society because of their periods.
- The Parliament takes a stand in fighting menstrual poverty by supporting widespread availability of safe reusable menstrual products, in particular in large retailers and pharmacies across the EU.

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<sup>55</sup> European Commission (2018) *Impact Assessment Proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment*, page 11, [http://ec.europa.eu/environment/circular-economy/pdf/single-use\\_plastics\\_impact\\_assessment.pdf](http://ec.europa.eu/environment/circular-economy/pdf/single-use_plastics_impact_assessment.pdf)

<sup>56</sup> <https://www.mooncup.co.uk/why-mooncup/why-should-i-use-a-menstrual-cup/>

<sup>57</sup> [https://www.huffingtonpost.co.uk/2015/09/03/women-spend-thousands-on-periods-tampon-tax\\_n\\_8082526.html](https://www.huffingtonpost.co.uk/2015/09/03/women-spend-thousands-on-periods-tampon-tax_n_8082526.html)

Own calculation: £13 per month, €14.5 per month (conversion August 2018), €174 per year, making a total of €7,482 over a period of 43 years of having the period (from 12 to 55 years of age).

<sup>58</sup> <http://www.isonomia.co.uk/?p=4912>

<sup>59</sup> Menstrual cups cost about 30 euros per pair; the expected lifetime of each is 10 years. <https://www.thecupeffect.org/why-we-exist/>

<sup>60</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender\\_pay\\_gap\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics)

<sup>61</sup> The women's rights movement calls on governments to recognise menstrual hygiene as a basic need and right. As such, all EU member states should be encouraged to make use of the VAT Directive that allows national governments to eliminate VAT on menstrual products. This is important to ensure that the single-use plastic directive does not lead to a disproportionate burden on women menstruating by causing an increase in costs. India has scrapped its tax on menstrual hygiene products (<https://www.independent.co.uk/news/world/asia/india-sanitary-pads-12-tax-protests-period-poverty-piyush-goyal-a8459801.html>), Australia is about to scrap theirs, and so should all EU member states.

That this is accompanied with awareness raising measures on alternatives to single-use menstrual products.

- Women are not exposed to hazardous substances in menstrual products that are linked to well-known types of cancer and organ malfunction<sup>62</sup>.
- Promoting the replacement of single-use plastic menstrual items with reusable ones curbs single-use plastic pollution.

Article 1 (on the objective of the Directive), Article 6 (on product requirements), Article 7 (on marking requirements) and Article 10 (on awareness raising measures) of the current proposal offer an excellent opportunity to fight all of the above points, and we would like you to support the following changes:

- Article 1 should be amended in order to ensure that:
  - The objective of the Directive includes transitioning to a non-toxic circular economy; and
  - The Directive aims to achieve a reduction in the consumption of single-use plastics through sustainable business models, as well as non-toxic products and materials, thus also contributing to the efficient functioning of the internal market.
- Article 6 should be complemented in order to ensure that:
  - The product requirements for all products referred to in the Directive prevent the use of hazardous chemicals in their composition.
- Article 7 on marking requirements should be amended so that:
  - All the product information listed in Article 7 is provided to consumers (not allowing manufacturers to pick their preferred one);
  - A new point is added, on the provision of information on the availability of existing reusable alternatives (such as reusable cups or pads); and
  - A new point is added on the presence of chemical components meeting the properties of Article 57 of Regulation 1907/2006, or which have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).
- Finally, Article 10 should be complemented so that:
  - Measures are implemented to inform consumers of the risks of the chemical components and additives in plastics on human health; and
  - Reusable menstrual products are made widely available in each Member State, in particular in large retailers and pharmacies; and awareness-raising measures on alternatives to single-use menstrual products are implemented, including through school programmes.

This is an opportunity for MEPs to champion women's issues ahead of the elections by ensuring that women have access to cheap and toxic-free reusable menstrual alternatives will show that MEPs take women's well-being and environmental protection seriously.

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<sup>62</sup> <https://hej-support.org/together-for-toxic-and-plastic-free-periods/>

#breakfreefromplastic

Economies, societies and citizens are ready – and are even demanding – to change their relationship with plastic and to take bold action to eliminate plastic pollution<sup>63</sup>. Adopting the changes in the legislation described above will have a direct, positive impact on women's lives, will help achieve a reduction of plastic pollution and will create new business opportunities for EU companies. We, and countless Europeans, are counting on you to bring about the change we all want to see.

If you would like more information or have questions on the points above, we would be delighted to meet with you in the coming weeks.

Yours sincerely,



Joan Marc Simon

Director, Zero Waste Europe



Alexandra Caterbow

Co-Director, HEJSupport



On behalf of the organisations listed below:

**SIGNATORIES:**



<sup>63</sup> Over 90% of citizens highlighted this in a Eurobarometer poll (European Commission, 2014, Attitudes of Europeans towards Waste Management and Resource Efficiency, Flash Eurobarometer 388; [http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl\\_388\\_en.pdf](http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf)) and almost 700,000 citizens signed a petition (<https://act.wemove.eu/campaigns/483>) asking for action at the EU level.

#breakfreefromplastic



Hnutí DUHA



#break**free**fromplastic



**GREENPEACE**

**SUPPORTERS:**

natracare® eco ♻️ femme

**Annex: Suggested amendments to the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment***

The following amendments seek to ensure that measures to promote healthy reusable alternatives to single-use plastic menstrual items are introduced in the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment*.

**Article 1 - Objectives**

The objective of this Directive is to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a circular economy with innovative business models, products and materials, thus also contributing to the efficient functioning of the internal market.

The objective of this Directive is to prevent and reduce the impact of ~~certain-plastics products~~ on the environment, in particular the aquatic environment, and on human health as well as to promote the transition to a **non-toxic** circular economy ***through a reduction in consumption of single use plastics***, ~~with innovative~~ **with sustainable** business models, **non-toxic** products and materials, thus also contributing to the efficient functioning of the internal market.

**Article 6 - Product requirements**

New

***5. Member States shall ensure that the product requirements for all products referred to in this Directive shall prevent the use of hazardous chemicals in their composition.***

**Article 7 - Marking requirements**

1. Member States shall ensure that each single-use plastic product listed in Part D of the Annex placed on the market bears a conspicuous, clearly legible and indelible marking informing consumers of one or more of the following:

1. Member States shall ensure that each single-use plastic product listed in Part D of the Annex placed on the market bears a conspicuous, clearly legible and indelible marking informing consumers of ~~one or more of~~ the following:



**Article 7 - Marking requirements**

(c) the presence of plastics in the product.

(c) the presence of plastics in the product ***and, where applicable, the availability of alternatives;***

**Article 7 - Marking requirements**

New

***ca) the presence in the product of components meeting the properties of Article 57 of Regulation 1907/2006 or that have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006, establishing the candidate list for substances of very high concern (SVHC).***

**Article 10 - Awareness raising measures**

New, Article 10 sentence 2

***Member States shall ensure that reusable menstrual products are made available widely in their territory, in particular in large retailers and pharmacies; and carry out awareness raising measures on alternatives to single-use menstrual products, including through school programmes***