



SKANSKA

**Open Letter to
The Ministers for Trade and Industry of the Member States of the European Union
The Ministers for the Environment of the Member States of the European Union
The Members of the European Parliament**

REACH, the proposal for a new EU chemicals policy is now in the final stages of the legislative process. Eureau, the European Union National Associations of Water Suppliers and Waste Water Suppliers and Skanska, the global top 3 construction company, follows the process with great interest, as the end-result will have a major impact on our two sectors.

Housing and water are essential to all European citizens. We are very close to the consumers in our operations, providing services of vital importance. In order to achieve sustainable production of drinking water, waste water treatment and sustainable construction of houses we strongly feel that an upstream approach is needed. Information on chemicals needs to be improved and chemical substances must be controlled by the actor in the most favourable position to actually do so, that is at source.

We welcome REACH as an excellent opportunity for the EU to further sustainability, for us as well as other branches of European Industry. This however requires clear provisions that facilitate a stricter authorisation process and information requirements which benefit down stream users as well as consumers.

A strong REACH will be of great importance for the sustainability of our businesses and also much better in line with the objectives of article 174 of the EC Treaty; the principles of preventive action, the principle that environmental damage should as a priority be rectified at source and that the polluters should pay.

With flaws in these provisions on the other hand, the situation would become untenable for us, as it would be impossible for us to screen and process the high concern substances entering our production processes and waste water treatment plants.

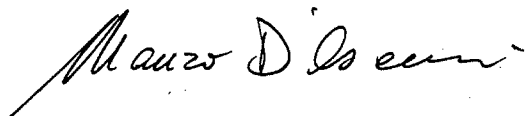
Therefore we urge you to support the position taken in the European Parliaments Recommendation for Second Reading, as adopted in the Environment Committee on 10 October 2006, in regarding:

- **Authorisation:**
 - Article 59.2 (Amendment 99) provides *one single route for authorisation* whereby Substances of Very High Concern will only be authorised for use if there are no suitable alternatives, if the socio-economic benefits outweigh the risks and if the risks are adequately controlled.
- **Information in the Supply-chain**
 - Article 33A (new), introducing a Duty to Communicate which increases the flow of information in supply-chain, increases the information provided to professional users and confirms the consumer's right to know.
- **In addition, with relation to the Water Framework Directive**
 - Article 60.5, ensuring a compulsory revision of any authorisation if the environmental objectives of the Water Framework Directive are not met.

Council is now negotiation the REACH-proposal with the European Parliament through its rapporteur Mr. Guido Sacconi. We strongly feel that our perspective as actors with a strong presence at member state as well as European level delivers an important contribution.

Mauro d'Ascenzi

Thomas Alm

Handwritten signature of Mauro d'Ascenzi in black ink.Handwritten signature of Thomas Alm in black ink.

President of EUREAU

Executive Vice President, Skanska AB

On Skanska

Skanska is a global top 3 construction company with 60% of its business in the EU. We operate on a highly fragmented market, delivering products that typically have a long life-span. The buildings Skanska constructs will be used for decades. In our operations, we are faced with both workforce exposure risks and public exposure risks.

We don't use "chemicals" as such, we use branded products containing many different molecules from many different sources. This fact places barriers to communication in the supply-chain as a brand name does not necessarily say much about the chemicals it contains.

Hazardous substances

Skanska needs REACH to ensure increased transparency about chemicals throughout the supply-chain, as Skanska recognizes that risk is a never-ending challenge. E.g. in evaluating the information Skanska receives in Sweden from its suppliers, a local Skanska Business Unit found that a staggering 30 % of the data-sheets were in some way incorrect!

In addition, the "Technical literacy" in the construction-industry is a big problem due to worker profile. Most of the people handling the chemicals, material or the branded products do not have the know-how to do so properly. **By the time a product containing a hazardous substance gets into the hands of the workforce it is already in most cases too late to identify and manage the risks.**

The screening has to be done up-stream, long before a substance ever reaches our workforce.

On EUREAU

EUREAU is the voice of Europe's drinking water and waste water operators. The members of EUREAU collectively provide vital water and waste water services to more than 450 million European citizens. We are committed to sustainability in all aspects of our business operations and particularly in the provision of drinking water and waste water services. EUREAU therefore supported the vision of sustainability reflected in the REACH proposal of November 2003 and in the letters sent to the Members of the European Parliament in 2005 and 2006 and to the Council in 2005.

The need for an upstream approach

The chemical substances in the urban water cycle enter the sewer system from households and their consumer products, services, industrial discharges, or simply urban run-off (rain water). Non-biodegradable chemical substances coming to the waste water treatment plants from cities are in many cases not possible to treat, may also destroy the nitrogen removal process and will decrease the quality of the sludge and reduce the possibility to recycle valuable phosphorous to agricultural land. Non-biodegradable chemical substances in the water catchment areas will also reduce the quality of the European water sources for drinking water.

Therefore, *there is a clear need to have better information and to control chemical substances at source*, both for sustainable waste water treatment and for sustainable drinking water production.

REACH proposal

EUREAU welcomes the fact that the REACH proposal now is subject to the 2nd reading in the European Parliament. However, to be able to have a sustainable drinking water production and waste water treatment in the European Union, **there is a strong need for: a duty of care principle, a stricter authorisation process, and information requirements to down stream users and consumers and a stronger link between REACH and the regulations of priority substances in the Water Framework Directive.**