

June 14, 2004

Robert Howe, Senior Policy Advisor  
EU Services Directive Policy Team  
Department of Trade and Industry  
Bay 212, Kingsgate House  
66-74 Victoria Street  
London, SW1E 4720

Dear Mr Howe,

**RE: EU Services Directive Consultation**

I write as Chair of the Gender Expert Group on Trade (GEGT). In order to ensure that gender is mainstreamed into the UK government's trade policies and to increase the understanding of the gender aspects of trade, the DTI's Europe and World Trade Directorate with the support of the Women's National Commission have established this group. The GEGT aims to provide expertise on gender and trade by acting as a forum of information exchange and undertaking consultation processes with women's organizations, some development organisations with a specific expertise in gender issues, and academics engaged in research in this area. This group also aims to identify and develop relevant research and strategies to increase awareness of the subject.

The UK Government has asked for input from those who are likely to be affected by the EU Directive on Services in the Internal Market including; service providers and recipients, businesses, consumers, trade unions, regulators, NGOs, and interest and lobby groups. Women are part of all of these groups yet the directive document remains virtually silent on gender.

As stated in the directive, 80% of the UK workforce is in the service industries. In 2001, women made up more than half of the employees in that sector and 87% of women who were employed in the UK worked in the service industry. Although some impact assessments have reportedly been performed, there is no evidence of gender impact assessments being included in the research. Gender impact assessments must be performed in all areas affected by the directive to ensure that women will not bear a disproportionate amount of the associated costs.

The directive document indicates that some sectors of the population or business community may be affected differently from others as a result of the directive, based on the size or region of the business (*para. C117*). There are a number of differences based on gender within these populations that create the need for gender impact assessments. For example, more than half the employees in the services sector are female, compared with less than a third in the manufacturing sector (*para AC3.4.1, Chart 10*). This can be explained in part, by the greater number of part-time employees in the service sector (*para. AC3.4.1, Chart 9*). Of the four largest categories of services in the UK, as shown in Paragraph AC3.63, Chart 13, women are particularly highly represented as both consumers and providers in three of them – wholesale and retail trade; real estate and business activities; and health and social work.

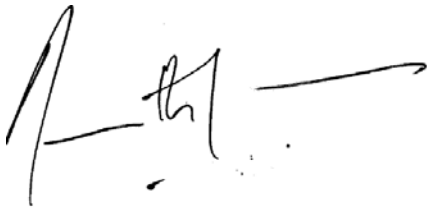
There is clearly a need to analyze the effects of the directive on women and men separately. And, considering the uncertainty around whether the benefits of the directive will outweigh the costs (*para. C118*), there is also a need for a gender impact assessment to be carried out on adjustment costs for both consumers and providers.

We welcome and support the fact that the existing community acquis prevents social dumping, including minimum wages and working conditions from being undercut (*para C65*), certainly essential

to both men and women. We also welcome the built in monitoring and review process, although there needs to be a gender impact assessment included in the monitoring system.

We have noticed an absence of women's groups on your distribution list and we urge you to consult with other women's organizations during this consultation process and throughout the review period. We would also be happy to speak with you further should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Annette Lawson". The signature is stylized and includes a long horizontal line extending to the right.

Annette Lawson, Chair

Gender Expert Group on Trade, DTI