



To: Commissioner Breton

CC: Commissioner Sinkevičius

European Commission, Rue de la Loi 200, Brussels

16 March 2022

**Re: High time to make certain that the EU chemicals industry is on the right path to a toxic-free environment and become global frontrunners**

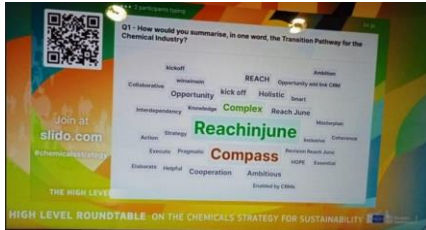
Dear Commissioner Breton,

We, the undersigned, warmly welcome the publication in 2020 of the Chemicals Strategy for Sustainability that shows the European Commission's willingness to serve its citizens, to protect their health and the environment and drive a vibrant chemicals sector by bringing about future-proof policy solutions. The Chemicals Strategy is a truly transformative agenda that can drive detoxification and decarbonisation of our economies, while creating jobs and economic opportunity.

However, the recent crises of the Covid-19 pandemic and Russia's illegal invasion of Ukraine, have resulted in an energy crisis, very high gas, electricity and fuel prices, and overall increased cost of living. In times of crisis, there is a temptation to curb the green agenda and not heed the voices of citizens and frontrunners given the urgency to act. We applaud your statement during the French Presidency's high-level conference that "the war doesn't make it [the transition] easier, but more necessary". Indeed, it is high time to strengthen chemicals regulation, but it's also clear that the pressure to delay reform has increased.

We understand that you supported the College decision for a postponement by one year of the revision of REACH. However, as acknowledged by many actors, the delay of the REACH reform by Q4 [puts the EU's chemical industry at a crucial crossroads](#) and hampers predictability. A timely revision of REACH is needed to provide the regulatory certainty for industry to plan and take accountability for the future as [clearly expressed by companies](#).

These views were also made clear during the High-level Roundtable on the implementation of the Chemicals Strategy for Sustainability meeting on 1 February. There was a [strong level of agreement](#) between industry, scientific, and civil society representatives on the need for regulatory predictability and certainty on rules on chemicals safety to guide the sector's green transition and investments. The Swedish Council Presidency delegation also confirmed their interest and ability for the presidency to table and host a discussion on the REACH Revision at their June environmental Council meeting.



The REACH revision's delay dominated the discussions and in a poll at the end of the meeting, "REACH in June" became the most popular phrase.

In your speech, it appeared as if you framed sustainability and competitiveness as conflicting factors. **We strongly believe that there is no contradiction between sustainable industry and competitiveness.** In fact, leadership in sustainability is a critical path towards a future-proof, competitive and resilient industry.

It was unfortunate that you were not able to stay long enough at the HLRT to hear our comments on how these delays affect the Chemical Industry Transition Pathway and other Commission efforts. Therefore, we would like to repeat what we stated in the meeting. **We call on you to leverage these crises as an opportunity for change that leads to long term resilience. The promised revision of REACH offers a unique opportunity to achieve greater protection for EU citizens while supporting industrial competitiveness. This reform is also necessary in order to support progressive companies and SMEs that are currently struggling to survive.**

If the promised reform is not tabled by June 2023, it will likely not progress by the end of this Commission and Parliament term and mandate. This creates not only delays but also major uncertainty on investments, a lack of predictability for business, and fuels scepticism as to the level of your commitment to the European Green Deal, possibly undermining the legacy you are trying to build. Therefore, **we call on you to ensure the completion of the REACH regulatory reform by June 2023 at the latest. Otherwise, we risk missing the biggest opportunity for change in the last 50 years.**

We trust you to deliver this reform and we are willing to support you in this assiduous journey.

Thank you for your time and consideration,

Yours sincerely,

Patrick ten Brink, Secretary General, EEB

Olivier Rigaud, Chief Executive Officer Corbion

Malene Teller Blume, Coop Denmark A/S

Klaus Kümmerer, Institute of Sustainable Chemistry, Leuphana Universität Lüneburg

Stephen RUSSELL, Director-General. ANEC, the European consumer voice in standardisation

David Azoulay, Managing Attorney, CIEL

Chiara Martinelli, Climate Action Network Europe

Anne-Sofie Bäckar, Executive Director, ChemSec

Michael Warhurst, Executive Director, CHEM Trust

Christina Rudén, Stockholm University

Anne-Simone Parent, Chair EDC Advisory Group, Endocrine Society