

From: [REDACTED]
Cc: [REDACTED] (CAB-SINKEVICIUS); [REDACTED] (CAB-BRETON); [REDACTED] (GROW); [REDACTED] (CAB-SINKEVICIUS)
Subject: Follow-up on meeting with Novozymes on 15 September 2022
Date: mardi 20 septembre 2022 15:43:01
Attachments: [The Safety of Industrial Enzymes.pdf](#)
[The potentials of biosolutions_final_20SEP2022.pdf](#)
[Novozymes Sinkevičius Breton Cabinets.pdf](#)
[Novozymes Position on Taxonomy Second Delegated Act.pdf](#)
[Novozymes Bio-based substances definition.pdf](#)

Dear [REDACTED], dear [REDACTED], and dear [REDACTED],

Many thanks for taking the time last week to discuss with us the place for bio-based sustainable chemicals within the European Green Deal.

We have noted the following main points from our discussion:

- Novozymes face a number of regulatory threats as a result of industrial enzymes being categorized as 'Substance of Concern', despite their totally sustainable and safe profile proved by both EU legislation and scientific research.
- Enzymes' association with substances of concern has knock-on effect across different EU initiatives (REACH Regulation, Taxonomy Regulation, Safe and Sustainable by Design) by making us subject to possible restrictions (REACH Regulation) and even preventing us from being considered as green investments (Taxonomy Regulation).
- Considering the prominent role that biobased solutions have in many EU flagship initiatives (i.e. CSS, Bioeconomy Strategy and the Circular Economy Action Plan), it may be worth exploring how biobased solutions can be prioritized at regulatory level, mindful of the safety of the consumer, worker and professional.
- In the long-term, we believe that a separate regulatory framework for bio-based substances should be established to avoid a negative impact on the EU Green Deal agenda.
- There are ongoing discussions in the Commission on how to restrict the most harmful substances in upcoming EU regulation. Restrictions will be introduced based on a proportionate and preventative approach but are yet to be decided.
- The Commission is very cautious about the implications that the implementation of the EU Green Deal will have for the industry.
- Mindful of enzymes' categorization as substance of concern, the Commission is well aware of the important benefits that enzymes have and the need to differentiate between different levels of use.

As a follow-up to our discussion, please find attached:

- Our Power Point presentation from the meeting, also shared separately during the meeting.
- Novozymes' position paper on the safety of industrial enzymes.
- Novozymes' position paper on the EU Taxonomy.
- The definition of bio-based substances used in the Sustainable Use of Pesticides Regulation that we refer to in our Power Point presentation. We believe this definition may serve as an inspiration for distinguishing between fossil-based or synthetic chemicals and substances of biological origin or substances identical to them.

Lastly, please allow me to take this opportunity to share with you a newly published report from Copenhagen Economics on the potentials of biosolutions, identifying climate and sustainability potentials as well as barriers to growth. Of key importance is the report's conclusions on the global achievable emission reduction potential of around eight per cent of current global emissions as well as a potential surge in world markets for bio solutions from EUR 240 billion in 2020 to EUR 640 billion in 2030.

Please do not hesitate to reach out with any inquiries. We look forward to the continued dialogue.

Kind regards,

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