

From: [REDACTED] (GROW)
Sent: mardi 28 juin 2022 15:05
To: [REDACTED] (GROW)
Cc: [REDACTED] GROW F1; [REDACTED] (GROW)
Subject: RE: Follow-up on meeting with Novozymes on 27 June 2022

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: A FAIRE; Meetings

Dear [REDACTED]
thank you very much for your summary, which largely reflects the discussions at the meeting. Just to be sure there is no misunderstanding, I would like to highlight that enzymes are indeed a good candidate for essential use derogations but of course we cannot pre-empt the outcome of future discussions.
Thank you very much again for the good meeting and looking forward to further exchanges.
Kind regards
[REDACTED]

From: [REDACTED] <[\[REDACTED\]@novozymes.com](mailto:[REDACTED]@novozymes.com)>
Sent: Tuesday, June 28, 2022 2:30 PM
To: [REDACTED] (GROW) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] (GROW) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: [REDACTED] <[\[REDACTED\]@novozymes.com](mailto:[REDACTED]@novozymes.com)>; [REDACTED] <[\[REDACTED\]@novozymes.com](mailto:[REDACTED]@novozymes.com)>; GROW F1 <GROW-F1@ec.europa.eu>; [REDACTED] (GROW) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Subject: Follow-up on meeting with Novozymes on 27 June 2022

Dear [REDACTED] and colleagues,

Many thanks for taking the time yesterday to discuss with us the place for bio-based solutions 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 'Substances 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 over 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).
- Once a decision has been made on revising the Generic Approach to Risk Management under REACH, a step-wise approach will be used to implement the restrictions on the concerned substances. However, authority-driven derogations may be granted based on 'essential use', considering the substance' criticality for society and safety. Enzymes may be a "best case" for such derogations.
- [REDACTED]

- [REDACTED]

[REDACTED]

We look forward to the continued dialogue and to receive further information about the transition pathway. We will be in contact directly with [REDACTED] concerning potential inputs to the CARACAL document that will be discussed on 6 July.

Best regards,

[REDACTED]

Novozymes A/S

Biologiens Vej 2

2800 Kgs. Lyngby Denmark

Mobile: +45 [REDACTED]

E-mail: [REDACTED]@novozymes.com

Find Novozymes on: [Web](#) | [LinkedIn](#) | [Twitter](#) | [Facebook](#)

This e-mail (including any attachments) is for the intended addressee(s) only and may contain confidential and/or proprietary information protected by law. You are hereby notified that any unauthorized reading, disclosure, copying or distribution of this e-mail or use of information herein is strictly prohibited. Novozymes handles personal data as stated in our [privacy policy](#). If you are not an intended recipient you should delete this e-mail immediately. Thank you.