

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Chemical strategy for Sustainability- regarding your comments in DG ENVI draft
Date: lundi 27 juillet 2020 09:52:10
Attachments: [image001.png](#)

Dear [REDACTED],

Thank you for your message and your interest in the forthcoming Chemical strategy for sustainability of the European Commission.

I will obviously not comment on internal leaked document.

Should you wish to share some ideas and position beyond the contributions attached to your message, we would of course be happy to arrange a meeting early September.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: Friday, July 24, 2020 2:15 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Chemical strategy for Sustainability- regarding your comments in DG ENVI draft
Dear [REDACTED],

I am writing regarding the commentary made by DG Grow on the proposed Chemical Strategy for Sustainability [which was recently reported on in the media](#). We are deeply worried to see that DG GROW appears to deny the existing problem with hazardous chemicals and thus risk delaying the advent of a more innovative European chemicals industry despite the very clear ambition of the Green Deal and the European Commission's current agenda. This is very unfortunate.

Stricter regulation does not contradict innovation, rather it creates a necessary framework that pushes industry to be more innovative. According to a [recently published study](#) from ECHA, EU-regulation is the main driver for substitution of hazardous chemicals. Björn Hansen, executive director of ECHA, commented: "It's clear that the most innovative companies are those that have adopted a green mindset, with substitution at the core of their business activities."

ChemSec has [reached a similar conclusion](#): Recently we ranked the world's 35 largest chemicals producers on sustainability and found that European companies in general score better than American or Asian counterparts. The best ranked company, DSM, is European. It is thus time to recognise that EU-regulation is not a yoke under which European companies succumb but rather a necessary condition for innovation.

Status quo is not good enough. The world is changing, and so must Europe in order to meet the needs of its citizens – one of which is to tackle the problem with hazardous chemicals. We need stricter regulation to boost innovation, protect the environment and our society as a whole. It is thus troubling to [read about the close connections](#) between DG GROW and the part of industry that is bent on resisting change.

Earlier this year ChemSec presented [five aspects that the chemical strategy must include](#). One of these is to support industry frontrunners. We need to facilitate

market opportunities for innovative companies that are producing safer chemicals. This is only possible with stricter regulation. And we need the innovative companies if we want to reach our long-term goals.

Finally, we hope you will be able to see the need for a progressive reform, recognise the possibilities for European industry and support an ambitious Chemical Strategy for Sustainability. We call on you to make sure the outcome will be in line with what the Commission has promised within the Green deal.

Best regards,



ChemSec | Första Långgatan 18, SE-413 28 Göteborg, Sweden
| chemsec.org