

Subject: BEUC welcomes the Chemicals Strategy for Sustainability

Dear Commissioner Sinkevičius,

On behalf of BEUC, I wish to congratulate the European Commission on its ambitious Chemicals Strategy for Sustainability. A strong EU chemicals policy is essential to achieve the objectives of the European Green Deal, including the sustainable use of resources and the protection of human health. As such, the new Chemicals Strategy is a crucial stepping-stone for the necessary societal transformation outlined in the European Green Deal, though swift implementation will be key to its success.

Consumers worry about their own – and their children’s – exposure to chemicals. Our Swedish member for example recently [found](#) that nine out of ten surveyed consumers are concerned that chemicals can harm current and future generations and the environment. Four out of five Europeans likewise expressed concerns about chemicals in everyday products, according to a 2017 Eurobarometer [survey](#). This is up from 43% in [2014](#).

Against this background, we warmly welcome that the Chemicals Strategy acknowledges those concerns – and commits the EU to address them through a concrete, ambitious action plan. Indeed, as Executive Vice-President Frans Timmermans [observed](#) on 14 October, “[...] we need to make sure that chemicals are produced and used in a way that does not hurt human health and the environment. It is especially important to stop using the most harmful chemicals in consumer products, from toys and childcare products to textiles and materials that come in contact with our food.” We fully support this vision.

We urgently need new solutions from the EU to minimise consumers’ exposure to harmful chemicals, including an integrated policy on chemicals in products, better protection of vulnerable groups, and a response to known policy gaps, such as combination effects or endocrine disruptors. We firmly believe the Chemicals Strategy is a first step towards delivering those solutions to Europe’s consumers and the environment.

We particularly welcome the Strategy’s recognition of the need to empower consumers and consumer organisations. Doing so will indeed be key to drive industrial change and to improving compliance with EU chemicals legislation, including at the EU’s borders and on online marketplaces. Consumer groups keep finding dangerous chemicals in products where they are not supposed to be. As the Strategy correctly states, there can be zero-tolerance for companies breaching EU chemical rules. The Chemicals Strategy is a real chance to tackle this problem – and the broader issue of hazardous chemicals in consumers’ lives – head-on.

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While the Chemicals Strategy promises to change how we produce, use, and consume chemicals in Europe, the real work now lies ahead. It is therefore imperative that the Commission acts swiftly and with ambition to ensure that the Chemicals Strategy delivers the necessary changes for consumers on the ground. This will in particular require that the implementing proposals live up to the Strategy's aims and intentions. When developing these proposals – which will be underpinned by the Better Regulation tools – the Commission must ensure that they reflect the Green Oath to 'do no harm', including the harm that results from failing to take action to protect people and the environment.

You can count on BEUC and our members to constructively and assertively contribute to making all these intended and needed changes a reality on the ground.

In our [experience](#), however, the Better Regulation agenda has too often come with a one-sided focus on regulatory costs to business whilst neglecting the benefits of legal protection and empowerment, which are vital for people's trust and well-being. A renewed Better Regulation policy is needed to achieve the changes for consumers promised by the Chemicals Strategy, as well as to support the credibility of the European Green Deal as a transformative agenda. The upcoming Communication on Better Regulation, planned for adoption in November, is therefore a significant opportunity to ensure that future EU actions and policies place the needs of people and our planet at centre stage.

Finally, the EU must ensure consistency among its policy tools. For example, EU trade policy needs to align with and complement the initiatives outlined in the Chemicals Strategy.

We look forward to an opportunity to meet you to exchange on how the Chemicals Strategy can deliver to consumers on the ground, as well as how we can take the next steps towards Europe's zero pollution ambition.

For your information, we have also sent this letter to Executive Vice-President Timmermans.

Yours sincerely,

Monique Goyens
Director General

C/c: Ms. Florika Fink-Hooijer – Director-General, DG Environment