

EU'S CHEMICALS ACTION PLAN



EEB proposals for a modern, competitive, and sustainable future for the EU chemical industry

Why this matters?

The EU chemical industry's model is at a crossroads. The EU can continue subsidising outdated, fossil-based, toxic production, or support the EU industry to become a global leader in sustainability, innovation, and resilience. The forthcoming Action plan for the EU chemicals industry must be a turning point: modernising the industry to protect people and planet while boosting Europe's competitiveness.

The risks of inaction

- Chemicals industry remains main contributor to climate change
- Toxic outputs breaching planetary boundaries, harming health and environment
- Public subsidies granted without conditions, failing to deliver jobs or climate gains
- Investment gaps, regulatory inertia, and innovation bottlenecks widening

EEB'S 10 KEY MESSAGES AND DEMANDS

• MODERNISATION OVER DEREGULATION

Key Message: Competitiveness in the 21st century depends on alignment with environmental, social, health, and innovation goals. Sustainability is not a burden, it is the path to long-term competitiveness. Europe should lead in sustainable, high-value chemistry rather than subsidise outdated fossil-based production models.

Demand: Move beyond regulatory "simplification" to full industrial modernisation.

• THERE IS NO SUSTAINABILITY WITHOUT DETOX: DEPOLLUTION AND DETOXIFICATION AS CORNERSTONES

Key Message: A zero-pollution and toxic-free environment must be a central pillar. This requires phasing out the most hazardous substances (e.g., PFAS), ensuring chemicals are climate neutral, safe and sustainable, and stopping subsidies that prolong toxic legacy chemicals and linear production.

Demand: Phase out hazardous substances. Align production with the zero-pollution ambition and ensure chemicals are clean, safe and sustainable at source.

• CONDITIONAL PUBLIC FUNDING TO SUPPORT A JUST AND GREEN TRANSITION

Key Message: the Chemicals industry action plan should drive decarbonisation, detoxification, and job protection, tying public money to public benefit.

Demand: Tie all public subsidies to clear, environmental and social conditions. No more bailouts like ArcelorMittal that fail to deliver jobs, climate, or health progress.

- **A ROADMAP FOR TRANSFORMATION, NOT STATUS QUO**

Key message: The Action Plan must lay out a credible Roadmap to 2050 for decarbonisation, detoxification, and circularity, with intermediate targets and sectoral pathways. Locking in fossil infrastructure or basic toxic chemicals must be avoided to preserve long-term viability and EU competitiveness.

Demand: Create a clear 2050 roadmap for a competitive, climate-neutral, detoxified and circular industry, avoiding fossil and toxic lock-ins through outdated infrastructure.

- **SUPPORT INNOVATION 'FROM LAB TO MARKET'**

Key message: Fund and de-risk innovation across the value chain. Public-private partnerships should support SMEs and start-ups working on safe chemicals, non-toxic materials, and advanced manufacturing. Lead markets, green procurement, and connected finance must accelerate deployment and uptake of safer alternatives.

Demand: Invest in scaling innovation. Support SMEs, R&D, public-private finance, and green procurement to drive uptake of safer, circular and climate neutral chemicals.

- **FOCUS ON HIGH-VALUE AND SPECIALTY CHEMISTRY**

Key message: The EU should strengthen manufacturing and strategic autonomy with safer, high-value chemistry.

Demand: Stop competing on cost for low-value bulk chemicals. Build strategic autonomy by becoming a global leader in high-value, clean, safe and sustainable chemicals and processes.

- **ADDRESS ENERGY, BUT GO BEYOND IT**

Key message: Clean energy is necessary but not enough. While clean energy and electrification are crucial, decarbonisation must be matched by depollution. Solely lowering energy prices or switching sources without changing what and how we produce risks increasing overall climate, pollution and health burdens.

Demand: Electrification and renewables must be paired with reduced production volumes, non-toxic design, and lower material and energy intensity.



- **SUSTAINABLE FEEDSTOCKS ONLY**

Key Message: The transition to renewable carbon and alternative feedstocks (bio-based, CO₂, waste-based) will only be future-proof if aligned with strict science-based sustainability criteria. The action plan should also avoid land-use conflicts, biodiversity loss, or shifting burdens to other regions.

Demand: Develop and apply science-based sustainability criteria for all feedstocks. Prioritise circular, non-toxic uses; avoid land-use pressures and external dependencies.

- **ENFORCE A LEVEL PLAYING FIELD**

Key message: Ensure a fair competition and a level playing field by enforcing rules on imports and online platforms that bring in toxic or lower-standard products, undermining EU chemical safety rules and sustainable producers. A true level playing field must reflect environmental and health costs.

Demand: Tackle pollution dumping via imports and digital platforms. Ensure imports respect EU standards, safeguarding both consumers and EU-based innovators.

- **POLITICAL LEADERSHIP FOR A JUST INDUSTRIAL FUTURE**

Key message: A transformative path will require leadership and sustained investment, but it's a far more cost-effective and secure path to tackle multiple crises and build a future-proof European economy. Now is the time to choose a thriving green industrial future over a fossil-fuelled past.

Demand: Support and invest on modernising the industry to addressing the multiple crises we face.

