

To:

The President of the European Commission  
The Executive Vice-President for the European Green Deal, Interinstitutional Relations and Foresight  
The Commissioner for Internal Market  
The Commissioner for Environment, Oceans and Fisheries  
The Commissioner for Energy  
The DK Council presidency

Cc:

Director-General, DG for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)  
Director-General, DG for Environment (DG ENV)  
Director-General, DG for Energy (DG ENER)  
Director-General, Joint Research Centre (JRC)

## **RE: Tracking of Substance of Concern is vital for product sustainability and EU competitiveness**

There is agreement that the future competitiveness of the Union depends on its ability to make the transition to a circular economy. As stakeholders await the European Commission's proposals for the Environmental Omnibus and the Circular Economy Act, we, the undersigned, representing 42 organisations, urge policymakers to commit to chemical transparency and traceability in products. To support a clean circular economy, value chain actors must be fully informed.

These objectives have been echoed by the Clean Industrial Deal (COM(2025) 85) and the European Chemicals Industry Action Plan (COM(2025) 530), the latter finding that "*the industry needs to transition to a clean and circular economy model*" (p. 1). The Chemicals Strategy for Sustainability (2020) commits to these aims by phasing out both the presence of certain substances that are harmful for human health or the environment, OR that prevent clean recycling.

The Strategy also commits (in the context of the Ecodesign for Sustainable Products Regulation (ESPR)) to minimise the presence of substances of concern in products and to ensure availability of information on chemical content and safe use. With the ESPR now in the implementation phase, we urge policymakers to uphold these aims in the upcoming delegated acts for the products identified in the first Working Plan.

Reporting obligations must be streamlined and integrated to ease the burden on companies, especially small and mid-cap businesses, but this does not mean eliminating the requirement to report. Every delay in reporting on substances of concern creates additional problems for the recyclers, remanufacturers, and circular economy operators of tomorrow; the less that is disclosed today diminishes the knowledge of the consumers of recycled products tomorrow.

Frontrunner companies are already making investments and efforts to phase out certain substances and to gather the needed information for more traceability in value chains. Delays only serve to reward companies falling behind and not those in the lead. As noted in a recent investor and business joint letter on the first omnibus package, "companies that implement EU sustainability rules are likely to be more resilient and better prepared for sustainability-related challenges".<sup>1</sup> Another recent letter from investors notes that chemical pollution exposes "companies and their investors" to financial risks<sup>2</sup>—showing the importance of traceability.

Meanwhile, recyclers and waste handlers must have more visibility and knowledge about how to best process the materials they receive. The presence of hazardous chemicals in reused and recycled content can therefore hamper the viability and safety of recyclates, and extend the presence of these substances in material cycles. The polluter-pays principle must be better reflected: extended producer responsibility schemes should share the financial burden of removing contaminants introduced by upstream actors.

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<sup>1</sup> Omnibus initiative: Sustainability rules are essential for European competitiveness. [Joint Statement Omnibus](#), 2 September 2025.

<sup>2</sup> [ShareAction | Investors press for action on toxic chemicals as...](#) 26 June 2025.

Ensuring chemical transparency is also essential for water service providers, who play an increasing role in the circular economy. The long-standing practice of sewage sludge recycling, for instance, enables the beneficial use of nutrients and organic matter from wastewater in agriculture and land management. When hazardous chemicals find their way into sludge from household and business wastewater, however, the sludge can become unfit for recycling.

The release of hazardous substances into the environment can directly pollute water resources and undermine the safety of drinking water supply. Without robust information on the chemical content of products, water service providers cannot effectively anticipate, monitor, or prevent these diffuse pollution pathways.

This underscores the need to phase out hazardous chemicals while preserving and strengthening transparency and traceability instruments. Only by ensuring full traceability of substances of concern across solid waste and wastewater streams can Europe unlock the circularity potential of the water services sector while safeguarding public health and ecosystems.

There is mounting scientific evidence confirming the association between prenatal (e.g. Endocrine-disrupting chemicals) exposure and preterm birth, pregnancy loss, impaired foetal brain development, infertility, hormone-dependent cancers, and transgenerational effects. Until products are safe, citizens have the right to know about the presence and hazards of these substances - including their nanoforms, and where they can be found in the products they buy.

This is not only a European concern. Although a Global Plastics Treaty is yet to be adopted, many nations are united around the need to tackle chemicals in plastics. The Global Framework on Chemicals calls for chemical transparency and traceability throughout value chains of manufactured materials and products, and to make this information available to all stakeholders.

In conclusion, we urge you to maintain the requirements of transparency and traceability of substances of concern in products. A stable policy environment is key, especially when some businesses have already taken these steps. The EU can lead on this important step in its transition to a clean and circular economy.

We greatly appreciate your attention to this important matter.

**Emily Best, Programme Manager - ECOS**

On behalf of:

- Arnika
- Baltic Environmental Forum Germany
- BUND/Friends of the Earth Germany
- Changing Markets Foundation
- CHEM Trust
- Child Rights International Network (CRIN)
- ClientEarth
- Common Ground
- Corporate Europe Observatory
- Danmarks Naturfredningsforening (Danish Society for Nature Conservation)
- Deutsche Umwelthilfe e.V.
- Društvo Ekologi brez meja
- ECOCITY
- Ecologistas en Acción
- ECOS
- En mode climat
- EurEau
- European Environmental Bureau
- Fair Resource Foundation
- Fashion Revolution
- Forbrugerrådet Tænk
- Friends of the Irish Environment
- Gallifrey Foundation
- GLOBAL 2000 Umweltschutzorganisation
- Green Transition Denmark
- Green With
- Hazardous Waste Europe
- Health and Environment Justice Support
- Health Care Without Harm (HCWH) Europe
- Hogar sin Tóxicos
- House of Baukjen
- Municipal Waste Europe
- No Plastic In My Sea
- Nobody's Child
- Plastic Soup Foundation
- Remnant Revolution
- Safer Chemicals Alternative-ALHem
- VeilleNanos par AVICENN
- Women Engage for a Common Future
- ZERO
- Zero Waste Europe
- Zero Waste Kiel e.V.