



Mr Hans Ingels,
Head of Unit
DG GROW
Avenue des Nerviens 105
1040, Brussels, Belgium

Brussels, 19 May 2026

Re: Critical Chemicals Alliance – Concerns regarding governance, transparency and strategic direction of the Critical Chemicals Alliance

Dear Mr Ingels,

I am writing on behalf of the undersigned Environmental Civil Society Organisations participating in the Critical Chemicals Alliance (CCA) to raise our concerns regarding the Alliance's governance, transparency and strategic direction.

NGOs support the objective to modernise and decarbonise the sector in order to protect and strengthen the competitiveness of chemical production in Europe. These are issues with far-reaching implications for health, the environment, workers, and public trust. However, we would like to share several concerns in a constructive spirit, with the shared objective of making the Alliance more effective, credible, and trusted.

1. Objective and scope

The current focus of the "Action Plan for European chemicals industry" and the Alliance appears to prioritise short-term concerns and risks reinforcing the long-term lock-in of the industry in its current unsustainable business model, rather than enabling systemic reform.

The chemical industry faces an intrinsic challenge that must be addressed to ensure its long-term future: it is a major driver of the climate crisis through its heavy reliance on fossil fuels for energy, petrochemicals, and feedstocks, as well as through the climate impacts of some of its products, such as plastics and fluorinated gases (F-gases).

To be effective, EU policy must align decarbonisation, defossilisation, detoxification, and circularity under a single regulatory vision. By transforming how chemicals are produced, used, and managed as waste, the industry can substantially reduce its impacts while strengthening its long-term competitiveness.

2. Governance, corporate capture and participation

We are concerned that the current governance structure of the Alliance risks limiting meaningful NGO participation.

While NGOs are formally included as members, they are excluded from both the Steering Committee and the working groups' Core groups, where strategic direction and priorities are defined. At the same time, NGO participation is largely channelled into the General Assembly and Extended Working Groups. These groups are merely information points and, if any decision is made, it is made by majority. Given

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the huge imbalance of NGOs and industrial interests (around 200 industry participants versus a handful of NGOs), our views and recommendations are structurally unable to be reflected in a meaningful way. At present, the actors in the driver's seat of the Alliance - including those shaping priorities and defining what constitutes "critical" chemicals, materials, and sites - are predominantly representatives of the chemical industry, coordinated in large part through industry structures led by CEFIC. These are the same actors whose activities are subject to current and future regulatory oversight.

This configuration raises a legitimate concern about the risk of regulatory or policy capture. Effective governance requires sufficient distance between those who are regulated and those who define the rules of the system. Without such balance, there is a risk that the Alliance's strategic direction reflects the interests of incumbent industry structures rather than the broader public interest and long-term transition objectives.

In simple terms, the current structure risks placing regulated actors in a position to shape the rules under which they themselves will operate. This is not a question of intent, but of institutional design and safeguards. The structural problem is straightforward: those defining the rules are the same actors who would be regulated by them.

In addition, strategic influence sits with those who already have the greatest resources, while NGOs are asked to contribute expertise and legitimacy in spaces where capacity is stretched and influence is limited.

This is not a question of willingness or expertise; it is a question of capacity, proportionality, and governance integrity.

We therefore encourage the Commission and Alliance members to reflect on how the governance structure -including representation in decision-making bodies and the balance between stakeholder groups - could be adjusted to ensure independence, transparency, and balanced participation.

3. Risk of a pre-emptive process

The Alliance is tasked with defining what constitutes a critical molecule and a critical site. Yet at the same time, key documents already pre-identify certain substances and value chains - such as ammonia, ethane, or petrochemical intermediates - as critical.

This creates a risk of a circular and pre-emptive process, where the outcome appears partly defined before the criteria are agreed. Criticality is not a neutral or purely technical concept; it reflects choices about time horizons, societal needs, environmental impacts, and transition pathways.

Without transparent, unbiased, and future-oriented criteria, there is a real risk that the concept of "criticality" becomes anchored in today's industrial structure, rather than supporting a forward-looking and sustainable transition.

4. Orientation of the working groups and required transition pillars

The current set of working groups is heavily oriented toward safeguarding existing production and market structures rather than transforming them. We believe that Europe needs a different model of competitiveness - one based on safety, sustainability, innovation, and long-term resilience.

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To ensure a successful transition, several critical pillars need to be considered across all working groups, including:

- A “triple win” approach to addressing the triple planetary crisis: decarbonisation, detoxification, and circularity
- Transition safeguards to avoid industrial lock-in, including:
 - Clear safeguards against prolonging unsustainable assets
 - Time-bound support and transition criteria
- Sustainable innovation, including green chemistry, substitution, demand reduction, and functional needs
- Skills development, green and quality jobs, and a just transition

Without these elements, the Alliance risks optimising today's system rather than building tomorrow's competitive advantage.

5. Transparency and access to information

We would also like to raise practical concerns regarding transparency and access to information within the working groups.

Documentation relevant to the working group's proceedings has been distributed across three separate platforms, two of which are hosted by Cefic - and to one of which (the Cefic Extranet) we have to date been denied access. It is not appropriate that an institutional process relies on a database managed by a lobby organisation. In addition, the list of extended working group participants was, moreover, published almost three months after the Alliance's inauguration.

A related concern is the unjustified pressure to accelerate deliverables through review and feedback windows that fall well below what meaningful engagement requires. The preparatory documents for meetings are often circulated extremely late. For example, for the meeting on 16 April, documents were received at 18:00 the evening before, leaving no meaningful time for review, preparation, or consultation. This is not compatible with effective and informed participation. Complex technical and policy questions cannot be substantively examined, internally consulted upon, and responded to within the timelines being imposed. The effect (whether intended or not) is that consultation is reduced to a formality, with the structural advantage accruing to those actors already embedded in the process and best positioned to shape its outputs.

In light of the above, we therefore formally request that DG GROW provide:

- Timely and equal access to all relevant documents for NGO participants
- Clarification on how governance arrangements will be adjusted to ensure balanced and meaningful stakeholder participation

We raise these points in a constructive spirit and with the shared objective of ensuring that the Alliance delivers a credible, forward-looking, and sustainable transition for the European chemicals sector.

We trust that DG GROW shares our commitment to an open, transparent and balanced stakeholder process, and we look forward to your response.

Thank you in advance,

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Kind regards

Tatiana Santos, European Environmental Bureau, Head of Chemicals Policy.

On behalf of:

1. Emma Richardson, Climate Catalyst, Head of Policy & Research.
2. Fernando Tonon, ECOS, Programme Manager.
3. EEB

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