

Dear Executive Vice-President Séjourné,

We are writing to express our serious concerns regarding the European Commission's Critical Chemicals Alliance, as currently designed and led by DG GROW.

Some of our organisations participate directly in the Alliance, while others remain outside. Regardless of our level of engagement, we share a common view: the Alliance is not creating the conditions for a fair, transparent and genuinely forward-looking transition for Europe's chemicals sector. Instead, it risks reinforcing the very business models that European industrial policy should now be helping to transform.

In particular, we are concerned that:

- **The Alliance's governance and decision-making model is fundamentally flawed.** Rather than operating on the basis of consensus, as would be expected of a multi-stakeholder alliance, decisions are taken by majority vote. At the same time, the current structure creates a significant imbalance between private and civil society interests (16 to 1), enabling incumbent actors with [vested interests](#) in the chemicals industry to exert overwhelming influence over the future direction of EU industrial policy and the allocation of public funding. Meanwhile, civil society organisations, independent experts, and innovators developing cleaner and safer chemicals remain largely excluded from meaningful decision-making, allowing incumbent producers to shape how "[criticality](#)" is interpreted and applied, despite their direct commercial interest in securing strategic status for their own products and production.
- **The Alliance has accepted the chemicals industry's narrative that its challenges stem primarily from external market pressures rather than structural challenges.** As a result, its approach directs public support for preserving existing production and industrial sites rather than the structural transformation needed to strengthen Europe's long-term competitiveness and advance its social, environmental and climate objectives.
- **The urgent imperative to detoxify the chemicals sector and address the growing health and environmental impacts of chemical pollution is entirely absent from the Alliance's agenda,** despite the Commission's wider commitments on environmental protection and public health. More broadly, the Alliance's DG GROW-led approach risks undermining the objectives of other Directorates-General responsible for delivering the Commission's health, environmental, climate and energy agenda, resulting in a fragmented approach to EU policymaking.
- **The Alliance's proposed decarbonisation pathways risk locking Europe into continued dependence on fossil fuels and fossil-based feedstocks,** while reinforcing petrochemical and plastics production, despite clear evidence of structural overcapacity and declining long-term demand.
- **The Alliance is building momentum for further deregulation** that favours incumbent industry interests while placing essential environmental and public health protections at risk.

Europe needs a resilient chemicals industry, but this cannot be built by preserving business as usual. The European Commission and Member States have a responsibility to ensure industrial policy supports the production of chemicals essential to society, rather than locking in further unnecessary production of fossil fuel-intensive and harmful chemicals.

**The Critical Chemicals Alliance, in its current form, falls short of that standard.** We therefore call on the European Commission to **fundamentally reform the Alliance** to ensure a transparent and public interest-led process that supports a genuinely sustainable transition for Europe's chemicals sector. **If the Commission is unwilling or unable to implement these reforms, it should discontinue the Alliance in its current form.**





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