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The Critical Chemicals Alliance:

By industry, for industry

How private influence shapes public priorities and investment

Executive summary

The Critical Chemicals Alliance was launched in January 2026. More than 200 guests and European Commission Executive Vice-President Stéphane Séjourné attended the inaugural meeting at a chemicals industry hub in the Netherlands. This EU process will ultimately lead to a list of chemical molecules and production sites considered 'critical' to support the EU economy. These critical chemicals would then receive public support, perhaps in the form of state aid from national governments. The idea of identifying critical molecules and sites originated in France, and mirrors other EU industry 'alliances' for different sectors. The proposal was swiftly adopted at the EU level, and is now presented as part of official efforts to 'save' the European chemicals industry, which repeatedly claims it is struggling financially.

But since the Alliance's launch, it has been clear that the European Chemical Industry Council (CEFIC) is in the driving seat of this initiative, with the Commission's industry department, DG GROW, unconcerned by the risk of the process being unduly influenced by corporate interests. As this report explains, the structure of the Alliance, including its Steering Board and working groups, are designed to give existing chemicals industry players a massive say in the outcomes, notwithstanding their vested interests. Meanwhile the policy direction of the initiative is also deeply problematic.

The world is awash with plastics and harmful chemicals such as forever chemicals (PFAS). But the Critical Chemicals Alliance studiously ignores the imperative for the chemicals industry to urgently detoxify their harmful products, in order to tackle the chemical pollution crisis which affects our bodies, climate, and environment. Instead many problematic and harmful substances are already being lined-up to be defined as 'critical'. The Alliance also looks set to boost false solutions to the climate crisis, while denying the need to phase down the petrochemical sector, which suffers from over-capacity and declining demand. This initiative is also likely to further boost the EU's current obsession with industry-friendly deregulation ie. rolling-back public interest social and environmental rules.

Considering the above flawed premise, it is perhaps not surprising that few NGOs chose to join the Critical Chemicals Alliance. And among the few that did join, with the aim of steering the Alliance onto a more sustainable course, some report that their voices have been entirely marginalised even though these groups represent vital human health and environmental pollution concerns.

The CCA is moving at great speed and may even conclude much of its work in October, after only ten months. It is disastrous that real action to tackle the chemical pollution crisis and the industry's significant contribution to the climate crisis is not happening at the same pace. Instead the Critical Chemicals Alliance looks set to reward the existing chemicals and petrochemicals industries – those responsible for creating these problems in the first place – while doing absolutely nothing to reduce their production of harmful chemicals and plastics.

This debate must be urgently reframed around the concept of public interest 'essentiality'. We should be considering what chemicals we need for essential societal functions, and which we do not, so as not to lock-in further, unnecessary production of harmful chemicals.

1. Introduction

A. Critical Chemicals Alliance: a quick explainer

You could be forgiven for never having heard of the Critical Chemicals Alliance (CCA). It was formally announced in July 2025 in the European Commission's Chemical Industry Action Plan. The alliance is described as "bringing together the Commission and stakeholders [to] tackle the main challenges affecting the [chemicals] sector." While ostensibly organised by the Commission's industry department, DG GROW, as we shall see, a huge amount of power seems to be in the hands of CEFIC, the European Chemicals Industry Council which, according to LobbyFacts, is the highest-spending corporate lobby group in Brussels.

The CCA aims to: establish criteria to identify "critical chemical productions and molecules for the European economy"; map which "critical molecules … can benefit from enhanced trade monitoring and support"; and support the EU and member states in "aligning investment priorities and guide coordination of EU support mechanisms with national projects". In short, the CCA will develop and test a methodology to define which chemicals are considered "critical", which will subsequently be used to specify which substances and sites are designated so. "Criticality" relates to the chemical substances and their production sites seen as vital to the EU economy. They will receive financial support, perhaps via state aid from member states or via the Industrial Accelerator Act. Other strands of work include a focus on aligning investment, coordinating trade, and creating "lead markets", to support these "critical" molecules and their production plants. This work could culminate in a Critical Chemicals Act to cement the alliance's conclusions in law.

According to a recent webinar presentation by controversial forever chemicals (PFAS: per- and polyfluoroalkyl substances) producer Chemours, the company "has been invited to the CCA to work on Critical Molecules and Sites especially due to its role in fluoropolymers production at the Dordrecht facility." But is Chemours' very controversial Dordrecht facility in the Netherlands really the kind of production site that should receive a "criticality" label and public support? This site is facing new legal challenges from local communities following years of PFAS pollution and unfavourable rulings. Moreover all but the most essential uses of fluoropolymers should be banned under the upcoming universal PFAS restriction, for environmental and public health reasons.

In a nutshell this one example reflects the problem with the CCA which looks set to reward the existing polluting industry, instead of driving urgent change towards a far less harmful future.

Box I

Is the chemicals industry really struggling?

The dominant narrative from the chemicals industry in recent years has been about how it has been struggling in the face of high energy costs and unfair competition from China. But these claims need careful probing.

Higher fossil energy prices are not new and are part of a long-term trend. While the 2022 invasion of Ukraine provoked a move out of Russian gas (something which should have happened years ago on ethical, climate crisis, security, and strategic autonomy grounds), the chemicals industry moved towards liquefied natural gas, from the US and Qatar, among other locations. LNG is highly problematic from a climate perspective, geopolitically unstable, and also subject to price hikes. By contrast EU countries with the cleanest energy mix and a high percentage of electricity from renewables have been protected from recent fossil fuel price hikes.

Meanwhile, a falling global share of spending on research and innovation has left the EU's chemical industry dependent on old and inefficient infrastructure and on fossil fuels. A recent study by Friends of the Earth Europe and SOMO showed that 130+ companies in the European chemicals sector generated a huge €322 billion in nets profit between 2010 and 2023. But it paid out three-quarters of those profits to shareholders. As one example, BASF, the biggest chemicals company in the world, paid out to shareholders 41 per cent of its €95 billion net profits between 2010 and 2023. Chemsec recently concluded that these trends "[have] left the European petrochemical sector unable to compete on the global market, especially amid the current overcapacity and weak demand."

In fact the European chemicals industry has already been publicly subsidised for over 20 years. It has generated huge 'windfall' profits from the emissions trading scheme (ETS) through receiving generous free carbon allowances which exceeded emissions. This enabled the industry to sell on the surplus allowance, while passing the costs (which were provided for free) onto product pricing. According to Carbon Market Watch and WWF, in 2023, numerous companies had extraordinarily high percentages of free carbon allowances versus their emissions, including BASF (112% of free allowances over emissions), fertiliser producer Yara (111%), petrochemical giant Ineos (109%), French producer AirLiquide (79%), and Belgian producer Solvay (119%). Meanwhile the chemicals industry's carbon dioxide emissions "remain stubbornly high". According to *Politico*, the chemicals sector looks set to benefit again in the 2026-2030 period thanks to revised ETS benchmarks.

The petrochemicals sector seems to be a particular drag on the wider chemicals sector's financial health. As the Center for International Environmental Law has said: "In the past few decades, petrochemical production – particularly plastics

– has grown steadily, reaching a point where production capacity is set to outpace projected demand growth. As a result, the petrochemical industry now faces overcapacity and a decline in industry competitiveness."

Given all of the above, it would seem prudent to critically question the chemical industry's demands for urgent, unconditional public support.

B. French industry-friendly proposal gains support

The CCA is primarily modelled on the Critical Medicines Alliance, but the Commission has launched other similar industrial alliances in recent years, including on hydrogen, batteries and raw materials. As far back as 2021, Friends of the Earth Europe denounced such alliances as: "another opportunity for industry to unduly influence political processes and direct public spending."

The idea for explicit coordinated EU action on critical molecules initially seems to have come from the French Government in December 2024, just as the second von der Leyen Commission was taking office and preparing its flagship Clean Industrial Deal. As reported by *Contexte*, the French chemicals industry lobby France Chimie had already called for a "Chemical Act" so that the sector could "benefit from a policy dedicated to the most critical upstream materials for the rest of the industrial sector [and] so as to prevent new vulnerabilities", as part of its demands for the June 2024 EU elections.

Building on a call for a 'European Sustainable Carbon Policy Package for the Chemical Industry' which was originally discussed by the Competitiveness Council in May 2024, a draft French proposal obtained by *Politico* (and dated December 2024) outlined a list of 14 strategic molecules considered key to preserving Europe's industrial and economic resilience. These were: ethylene, propylene, butadiene, benzene, ammonia, methanol, chlorine, sodium hydroxide, sulfur, silicon, sodium carbonates, hydrofluoric acid, methionine, and lysine. But rather than a list of key, strategic molecules, this appears to be an attempt to protect the entire existing chemicals industry, as they cover the vast majority of the chemicals produced by the sector.

Box II

Critical or problematic molecules?

Some of the molecules listed in the French proposal as "critical" are highly problematic.

- Ammonia, methanol, ethylene, propylene, butadiene, and benzene are petrochemicals derived from fossil fuels: petrochemicals have major consequences for the climate crisis, human health, and the environment. Notably plastics and nitrogen fertilisers account for the overwhelming majority of petrochemical production globally.

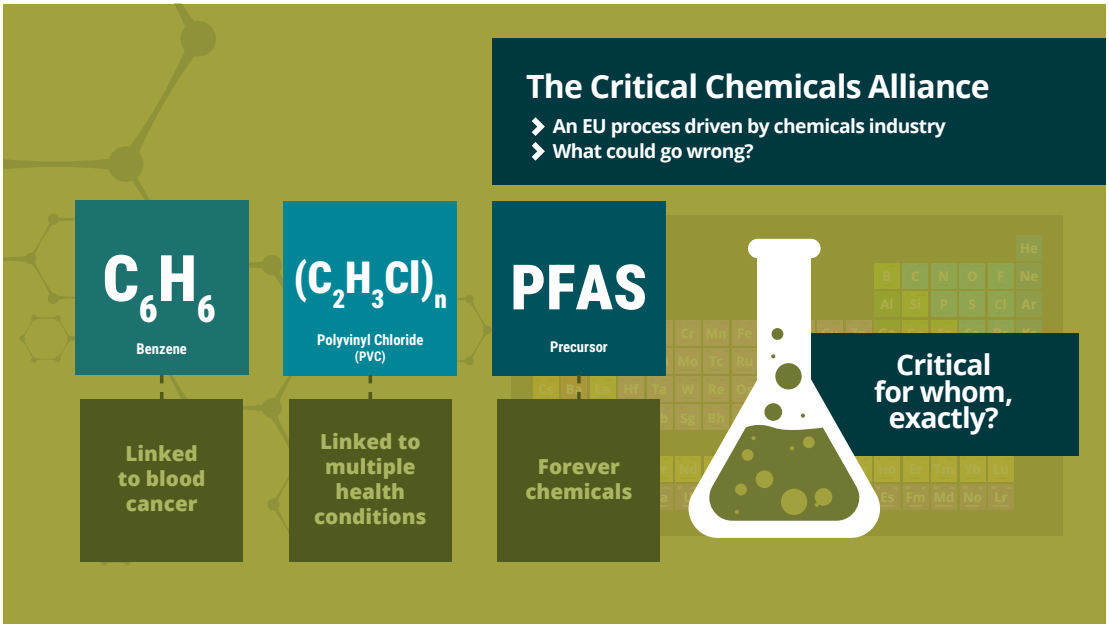
- More specifically, benzene is strongly linked to blood cancer, and is one of the most well-established industrial carcinogens. Together with ethylene, benzene is used to manufacture polystyrene, which is an environmental hazard, very difficult to recycle, and breaks down into microplastics that have a long life.

- Chlorine is used to produce PVC (polyvinyl chloride), which is linked to many human health conditions and is currently identified as a priority for regulatory action under the EU's REACH chemicals rules[1].

- Other chemicals on the list, such as hydrofluoric acid, are precursors to PFAS. Per- and polyfluoroalkyl substances, also called 'forever chemicals', are a chemical group described by scientists as the cause of the "worst pollution crisis humanity has ever faced".

As explained in section 3E below, these problematic chemicals remain on the agenda of the CCA today.

1 The 2006 Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) is an EU law which aimed to improve the protection of human health and the environment via better and earlier identification of harmful chemicals, with a view to phasing out or restricting them.



The French Government's plan aimed to better channel financial support to chemical plants that require "decarbonization and modernization", in order to support the production of these "critical" chemicals'.

Regrettably there was no mention whatsoever in the French proposal of the detoxification agenda ie. to remove harmful chemicals from industrial, professional, and consumer uses. Instead there were just a couple of passing references to "[not] compromising the high levels of environmental and health standards in the EU as well as the existing REACH framework." This is contradictory considering that, as explained in Box II, some of the chemicals deemed "critical" such as benzene, PFAS, and PVC, are at odds with REACH priorities.

Having come up with its proposal, the French Government undertook a series of initiatives to promote it to the Commission:

- A specific meeting was held with DG GROW, where the idea was presented in some detail on 24 January 2025.

- A panel discussion entitled "desired developments for the chemical industry in Europe", which was part of a conference organised by the French Permanent Representation in Brussels on 21 February 2025, discussed the CCA. CEFIC, its national member France Chimie, and DG GROW were on the panel. According to attendees, France Chimie referred to it as "our proposal", indicating that it viewed itself as the originator of the initiative.

- Further exchanges and / or meetings between DG GROW and the French Government on the development of the CCA took place in March and again in June 2025, when Paris supplied "five more general criteria" to evaluate "strategic chemicals production in the EU".

- The French Government also liaised with DG Trade to set up monitoring of the levels of imports of certain chemicals, initially ammonia, ethylene, and urea (two of which had already been identified as "critical" substances in the initial French proposal). Subsequently they focused on some additional substances which were said to have "worrying import and EU production data".

At member state level, the idea was also gaining momentum. By March 2025 a revised French proposal (which now included a short section about transitioning away from fossil-based molecules to bio-based ones) had obtained the support of Czechia, Hungary, Italy, Netherlands, Romania, Slovakia and Spain, with a video conference and then a joint submission to the Competitiveness Council. A discussion then took place on 12 March, although no minutes of the meeting are available. *Politico* reported at the time that the German Government was critical of the proposal, as it was "a short-term measure", matching the scepticism of the German chemicals industry (see below). Nonethe-

less Germany is reported as having "'welcome[d] the alliance proposed by France' as a good basis for 'constructive' cooperation on the chemical industry's competitiveness."

The German fears must have been assuaged because by the time the Commission's Chemicals Industry Action Plan was launched in July 2025 the CCA had become a concrete EU commitment. The alliance is fully in line with the Commission's industrial competitiveness approach. Following the wholesale adoption of the demands of CEFIC's Antwerp Declaration via the Clean Industrial Deal, the alliance is another way for the Commission to express its fulsome support for the incumbent EU chemicals industry. Moreover the CCA concept is built on, and further promulgates, the industry's narrative that it is struggling due to causes beyond its own control, and that it deserves unconditional public funding.

2. Corporate capture

A. A lobby target from the start

As soon as the French Government raised the idea of action to protect so-called critical molecules and their production sites, the chemicals industry quickly mobilised to shape the emerging policy. A series of meetings between DG GROW and major industry associations provided repeated opportunities to discuss and refine the proposal. According to documents received from the Commission:

- On 16 January 2025 CEFIC told the von der Leyen cabinet that "they advocated to consider a Critical Chemicals Act to address the risk of strategic dependencies in the supply chain."

- On 11 March 2025 DG GROW attended a meeting of the Verband der Chemischen Industrie (VCI, the German chemicals industry) Committee on European and National Industrial Policy where France Chimie presented on the critical molecules initiative. Publicly mirroring concerns voiced by the German Government (see above) VCI expressed some scepticism about the critical chemicals proposal, telling *Politico* that the concept "does not seem sufficiently clear to us in its current form, even though we support the objective." VCI said it preferred an approach based on "far-reaching simplification of the current EU regulatory framework and the promotion of innovation". Nonetheless after the meeting VCI confirmed to DG GROW that it "would be delighted if we could continue the dialogue on some of the topics raised – such as the '(Critical) Chemicals Act'...".

- Despite, or perhaps because of this scepticism, on 24 March 2025 DG GROW and the VCI met again and discussed the "difficult situation" facing the chemicals industry, this time at a meeting hosted in the Commission's office in Berlin.

- On 10 April 2025 the topic was raised in a meeting between CEFIC and DG GROW.

- The day after, 11 April 2025, CEFIC had yet another meeting with DG GROW where it presented its so-called '10-Point Rescue Plan for Chemicals', which included a demand on the CCA.

Following the July 2025 announcement of the Chemical Industry Action Plan and its intention to move ahead with the CCA, various companies and trade associations contacted the Commission to express their support for the initiative – and, in some cases, to advocate that they should become members of the alliance.

- Arkema met DG GROW on 6 October 2025 and the French PFAS-producer "highlighted the potential benefits of the Critical Chemicals Alliance (CCA) in supporting critical sites in the EU." The company also underlined the importance of "fast and fit for purpose solutions for the sector".

- France Chimie, Arkema, and other industry groups also met DG GROW a few days later on 9 October 2025. The French body "committed to apply for the Critical Chemicals Alliance membership". The meeting also called for "action towards agile, faster, pragmatic tools to preserve the capacity in EU", including "'union interest' that considers [a chemical] site's vulnerability, security of supply, and sovereignty." Industry also lobbied on certain substances: PVC and ammonia were specifically mentioned.

- Plastics Europe met DG GROW on 6 October 2025 and expressed interest in applying to join the CCA. It said that it foresaw "the CCA as a place where people can come with practical problems and find common solutions to solve them."

The sequence of events points to industry engagement that not only helped build momentum for the initiative but also shaped its direction and the interests it would ultimately serve.

B. Structural corporate capture and built-in industry voting majority

The CCA officially launched on 13 January 2026 at its inaugural General Assembly at Chemelot, a private chemical industry park at Geleen, in the Netherlands.

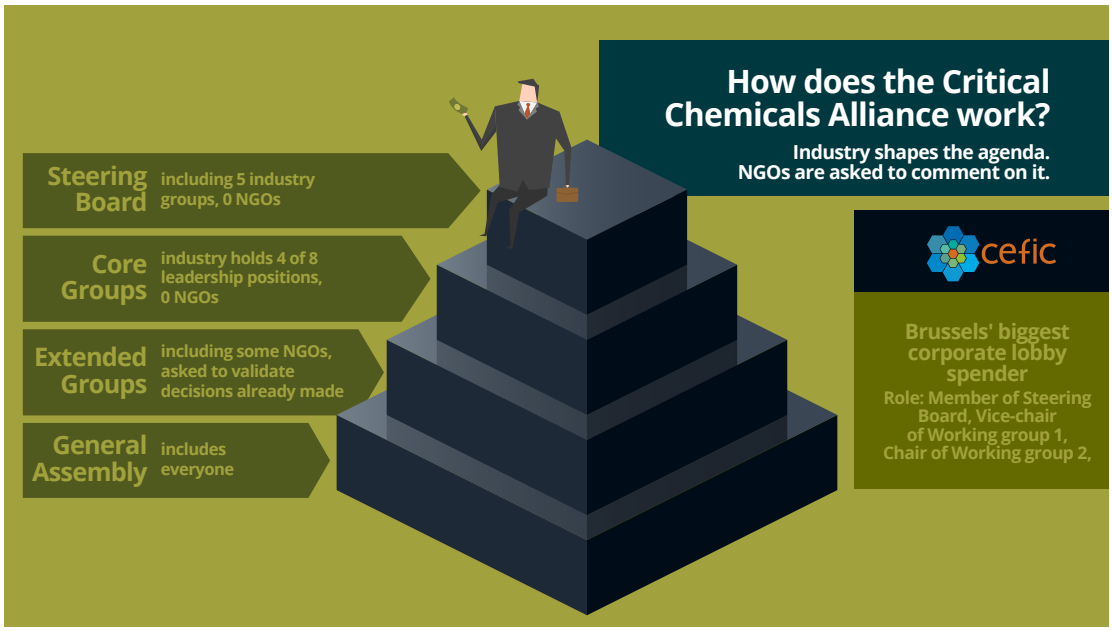
According to the CCA's background documents, the **General Assembly** is the "main forum for strategic dialogue" for the alliance, and at the launch there were perhaps 200 people present. This meeting was the first opportunity for those who had been accepted as members of the CCA by DG GROW to gather and learn about the work of the alliance in any sort of detail.

Opening remarks were made by the Executive Director of Chemelot; the Dutch climate minister; Commission Executive Vice-President Stéphane Séjourné; and Marco Mensink, the Director-General of CEFIC. But notably no NGOs were invited to provide opening remarks. DG GROW then outlined how a Steering Board would "guide its priorities" and "coordinate the work of the different Working Groups".

The CCA's **Steering Board** is chaired by the Commission and includes:

- six member states: Czechia, France, Germany, Italy, the Netherlands, Spain
- two regional authorities: the Netherlands / North Rhine–Westphalia / Flanders region, and the European Chemical Regions Network (which advocates for a "stronger regional dimension in European strategies and policies related to the chemical industry" and brings together regional governments with large chemical industry interests in their area)
- five industry representatives: CEFIC, Fertilizers Europe, Plastics Europe, SME United, and the Downstream Users of Chemicals Coordination Group (DUCC)
- two representatives of trade unions: IndustriAll Europe and the European Trade Union Confederation (ETUC). In fact ETUC was subsequently replaced by the German trade union, IG Bergbau, Chemie, Energie (IGBCE).

Notably, not one single NGO was included on the Steering Board.



Many of the industry lobby groups represented on the Steering Board regularly lobby against tougher regulation of harmful chemicals:

- CEFIC has been criticised for its lobbying to water down various chemicals rules, including the now-scrapped revision of the REACH chemicals regulation (for example here, here, here, and here);
- Plastics Europe and its fluoropolymer-producing company members were heavily criticised by the January 2025 Forever Lobbying Project, which labelled fluoropolymer industry lobbying against the proposed universal PFAS restriction as "fearmongering, false, misleading, or potentially dishonest";
- DUCC has lobbied against progressive proposals (here and here) to reform REACH;
- Fertilizers Europe lobbied against the now-withdrawn Farm to Fork proposal.

In total these four corporate lobby groups have an annual declared EU lobby spend of at least €17 million.

At the General Assembly, DG GROW also introduced the **Working Groups** which would carry out the "analytical and technical work" of the CCA ie. the substantive work. Four working group themes had been pre-developed:

- Working group 1 – critical molecules and critical production sites
- Working group 2 – trade
- Working group 3 – modernisation and investments
- Working group 4 – lead markets

The roles of chair and vice-chair of these working groups had already been allocated by the time of the first General Assembly. Remarkably CEFIC is vice-chair of working group 1 and chair of working group 2; Fertilizers Europe is vice-chair of working group 2; and the Bio-based Industries Consortium is vice-chair of working group 4. In short, industry holds leadership positions for three of the four working groups. The marginalisation of NGOs also continued – no NGOs were included in any leadership position.

Working Groups: proposed chairs and vice chairs

	WG 1: critical molecules and critical sites	WG 2: Trade	WG 3:Modernisation and Investments	WG 4: Lead Markets
Chair	France	European Chemicals Industry Council (CEFIC)	Trilateral Chemical Region	Netherlands
Vice Chair	European Chemicals Industry Council (CEFIC)	Fertilisers Europe	Region Lombardy	Bio-based Industries Consortium

Screenshot from DG Grow presentation to General Assembly, 13 January 2026

At the 13 January General Assembly these decisions were put to a vote of validation by the assembled delegates via a slido poll which asked the question: "Do you agree with the proposed composition of the Steering Board and the chairs of the Working Groups?". Of course with an industry-packed room, the result was a foregone conclusion. The assembled delegates were then given 10 days to express an interest in joining a working group.

Box III

A perspective from inside the General Assembly

an interview with Tatiana Santos, Head of Chemicals Policy, European Environmental Bureau

"Joining the first CCA General Assembly was quite an experience. I had assumed the Commission was running the process. It had officially launched the initiative as part of its Action Plan for the Chemical Industry, managed the application process for participation, and issued the invitations to attend the assembly. So I was quite surprised when we arrived and realised it was not really the Commission organising it at all. CEFIC seemed to be running the show.

The General Assembly did not really function as a discussion forum; instead, participants were largely asked to ratify decisions that had already been taken. For example, the composition of the Steering Board that will drive the process forward had already been decided in advance, leaving very little room for meaningful discussion.

For 20 minutes I tried to take the floor: I was standing up, waving, and even industry people around me were trying to help get me noticed by the Director-General of DG GROW who was chairing the 'discussion'! Finally I managed to make my points, but there was no balance in who took the floor. I raised concerns about the lack of meaningful NGO participation, particularly the exclusion of civil society from the Steering Board, as well as the broader governance imbalance within the Alliance. I also criticised the fact that it was a largely pre-emptive process, where key substances and value chains appeared to have been identified as "critical" be-

fore transparent criteria had been agreed. In addition, I argued that the current approach focused too heavily on protecting the industry's existing model rather than driving a genuine transition based on decarbonisation, detoxification, circularity, and sustainable innovation. I proposed additional working groups on topics which I felt were missing such as substitution, green chemistry, and just transition measures, and stressed the need for a long-term, future-proof vision for the sector grounded in real sustainability. All of these suggestions were either ignored or dismissed. Separately an industry participant said something similar about the need for a long-term vision, but the responses from DG GROW and CEFIC indicated that instead those running the show were after short-term fixes.

Some industry representatives seemed frustrated that they had applied to join the Steering Board but had not been selected. Hearing that made me realise that when NGOs applied online to join the CCA, there was not even an option for us to indicate interest in joining the Steering Board. It seems that the exclusion of NGOs from the Steering Board had been decided from the outset.

The Director-General of Grow explained that ratification decisions would be taken by a majority vote. But with around 200 people in the room, the vast majority representing industry, the outcomes were never really in doubt. Slido polls were used to gauge support for the various 'proposals', and they were typically approved by 98 or 99 per cent of those voting! Those of us who disagreed were simply invited by DG GROW to send their comments by email afterwards – essentially it was all a fait accompli.

My impression, based on the way that Marco Mensink from CEFIC presented things, the way in which he talked on behalf of CEFIC about agreements made concerning the rushed timeline, the structure of the Steering Board and working groups, was that there must have been substantial preparatory work behind the scenes involving both DG GROW and CEFIC. My perception was that it was CEFIC running the show."

C. Conflicts of interest

Joining the CCA working groups was massively popular among the alliance's members, and the groups were over-subscribed. This matter was discussed with the chairs and vice-chairs of the working groups on 27 January 2026. At its meeting on 5 February, the Steering Board was then asked to accept a proposal that each working group should have a "two-tier structure: the full Working Group and a smaller core group". Steering Board members were told that "The exact composition of each core group will be agreed with the Chairs and Vice-Chairs in the coming weeks, considering the level of in-

terest expressed and the specific needs of each Working Group." If not selected for the core group, everyone else in each working group was relegated to a so-called 'extended group' which would be left to just comment on and validate the core group decisions.

In the first meeting of **working group 1** on 17 February, this approach was defended by the French Government (chair) and CEFIC (vice-chair) in a joint paper which presented the decision with "endorsement" from DG GROW. It explained that the membership of the core group had been chosen "from the 59 organisations that answered positively on the related poll from DG GROW". NGOs did not receive this poll. The list of core group members contains few surprises, although one does have strong sustainability credentials. Giant industry players such as BASF, Evonik, INEOS, Syensqo, and TotalEnergies are among the 13 core group members representing corporate interests, making up 65 per cent of the total membership. This is significant as the core group makes decisions through voting, so there is an in-built majority for industry. No NGOs were invited to join the working group 1 core group, yet it was presented as a "balanced" membership.

WG1 – Critical molecules and Critical sites

Configuration: Core Group

MEMBERS

Organisation Name	Organisation Type*
Avantium	Company
BASF	Company
CHIMCOMPLEX	Company
Evonik Industries AG	Company
Grupa Azoty S.A.	Company
Humens	Company
INEOS	Company
K+S Aktiengesellschaft	Company
Syensqo	Company
TotalEnergies	Company
Ministery of Climate and Green Growth, The Netherlands	National public body
Ministry of Industry and Tourism of Spain	National public body
IndustriAll European Trade Union	Other
Stichting Chemelot	Other
Emilia-Romagna Region	Regional public body
Flemish Region	Regional public body
Adechim	Trade association
APQuimica - Portuguese Chemical, Petrochemical and Refining Association	Trade association
Association of chemical industry of the Czech Republic	Trade association
Ghent University	University

Screenshot of official presentation

There are many criticisms to be made of some of the corporations awarded seats on the working group 1 core group:

- BASF, the biggest chemical company in the world, has chosen to invest 8.7 billion euros in a new *verbund* chemical plant in China, while at the same time laying-off European workers. It plans to spend at least €12 billion on shareholder dividends and share buybacks in the 2025-28 period. No wonder BASF workers have organised a protest with banners that read "Berliners Axed, Shareholders Flourishing" and "Broken Agreements, Sacrificed Futures".

- INEOS is one of the most controversial companies operating in Europe today. Its so-called Project One in Antwerp, Belgium, will produce propylene and ethylene and is designed to "turbocharge European plastic production". The project is going ahead despite overall petrochemical production capacity being likely to soon outpace projected demand growth, and the local communities' concerns about its significant potential health impacts.

- Among other controversies, Syensqo's chemical plant at Spinetta Marengo (formerly part of Solvay) has been associated with long-standing contamination issues, such as PFAS detected in the blood of local residents.

- TotalEnergies is another controversial company, connected to numerous scandals around the world. The company was found guilty last year in a Paris court of misleading consumers. By giving the impression, through its advertising, that it is part of the solution to climate change, despite continuing to actually increase its production and investment in oil and gas, it was found guilty in a case brought by Friends of the Earth France, Greenpeace France, and Notre Affaire à Tous, with the support of ClientEarth.

Meanwhile at least 50 per cent of the core group of working group 3 is also made up of key industry players, including CEFIC, Borealis, Evonik, Grupa Azoty, INEOS, MOL Group, Orlen, and REPSOL.

WG3 – Modernisation and investments

Configuration: Core Group

MEMBERS

Organisation name	Organisation type
Borealis GmbH	Company
CHIMCOMPLEX	Company
Evonik Industries AG	Company
Grupa Azoty S.A.	Company
INEOS	Company
MOL Group (MOL Plc. which include MOL Petrochemicals and Slovnaft Petrochemicals)	Company
Orlen S.A.	Company
REPSOL MATERIALS, S.A.	Company
Smart Delta Resources	National public body
TKI green chemistry and circularity (as part of ChemistryNL)	National public body
industriAll European Trade Union	Other
Platform Groene Chemie Nieuwe Economie	Other
Renewable Carbon Initiative	Other
Stichting Chemelot	Other
CHEMPARC	Other
Auvergne-Rhône-Alpes Region	Regional public body
Catalonia Trade & Investment (ACCIÓ, Catalan Agency for Business and Competitiveness)	Regional public body
Flemish Region	Regional public body
Regionae Lombardia	Regional public body
Cefic (European Chemical Industry Council)	Trade association
Sicos	Trade association

Screenshot of official presentation

For those left disappointed at not being invited to join the core group of working group 1, the message was that they should not worry: "There is no room for defending individual interests, and hence it should come as obvious that missing out on the core group cannot be – and will not be – detrimental to the identification of a given molecule as critical." This kind of argument is reinforced by the written commitment made by all members that they had no "actual, potential and perceived conflict of interest" with the Alliance's objectives or those of the working groups.

But is it really plausible to imagine that the companies engaging in the CCA, let alone in the core groups, will not be actively defending their own interests, nor trying to ensure that their own substances or production sites qualify for public support? Won't trade associations primarily work to defend the interests of the bigger, established members who fund them? After all, the very purpose of industrial alliances is to prioritise narrow commercial interests over, say, the public interest.

It seems likely that smaller, more innovative companies which challenge the old incumbent industrial behemoths and are developing greener chemicals might not have their voices effectively heard. There is a significant risk that the CCA will end up locking-in the status quo.

And what about NGOs in the extended group of working group 1? While they are invited to contribute inputs in between core group votes, the degree of uptake for their contributions appears varied. And they are only invited to comment on some, but not all, aspects of the group's work. This difficulty seems to be mirrored for NGO participation across some of the other working groups too.

The activity of all working groups is proceeding at great speed. It is therefore very worrying to hear concerns, expressed to Corporate Europe Observatory by participants, about the quality and framing of some draft texts which have contained "technical inaccuracies, broad or insufficiently substantiated claims, and language that was not concrete enough."

Working groups are expected to wrap up their work within months, with the second and possibly final General Assembly slated for October 2026. Of course it is deeply ironic to see the Commission and industry work together with such haste on this process. When regulation and policies to protect people and the planet from harmful chemicals are on the agenda, the chemicals industry uses all sorts of tactics to slow things down, often with great success. This is evidenced by the Commission's repeated delays to, and then eventual scrapping of, the REACH revision or how European Environmental Bureau research shows that it can take more than a decade to regulate hazardous substances in Europe. But when it comes to economic support, industry repeatedly stamps its feet to demand a speedy response, and in this case seems likely to get it. The speed of the process risks benefitting the CCA Steering Board and core group members who are the ones effectively setting the agenda and taking decisions.

As one NGO participant outlined: "Where core groups are dominated by incumbent industry actors and civil society is mainly diluted in wider groups, there is a risk that the sectors which require effective regulation hold the pen without sufficient scrutiny."

Box III

A perspective from inside CCA Working Group 1

an interview with Tatiana Santos, Head of Chemicals Policy, European Environmental Bureau

"Since the General Assembly my organisation has attended the online meetings of working group 1 on critical molecules and critical sites which is chaired by France, with CEFIC acting as vice-chair. The first meeting had 60+ participants and decisions had already been made. Due to the size of interest they had decided to split the group into a core group of 20 (a majority of which are industry representatives). Of course we were not invited to join and had no opportunity to request attendance. We were left in the extended group of wider participants which would discuss the decisions which the core group had already made.

When the organisers opened-up the meeting for discussion, many present started to complain that they were not in the core group and that they would like to follow the discussions that would take place there. While France was theoretically chairing the working group, and DG GROW was present, it was largely CEFIC taking the floor to respond to the questions and comments.

An official from DG GROW presented the objectives and scope of the working group, but we were not invited to contribute to the design of the governance, objectives or scope. They also explained that they had pre-selected three possible methodologies for deciding the criteria to be used to identify the critical molecules and sites, which is at the heart of the CCA concept. These three methodologies were submitted by France Chimie & Advancy; Chemelot; and CEFIC & PwC. We were told that it was the core group, not the extended working group, which would analyse, discuss, and ultimately make the important decision about which methodology to opt for.

I find the whole process incredibly pre-emptive. The objective of the working group is to define criteria to determine critical chemicals, materials and sites, but in fact the background documents already pre-identify certain substances and value chains – such as ammonia, petrochemicals, or chlorine to produce PVC plastic and other polymers – as critical, creating a risk of a circular and pre-emptive process, where the outcome appears partly defined before the criteria are agreed.

And I am very worried about the direction that this working group is going in. Will the chosen methodology come up with a definition of criticality which serves Europe's people and environment, or which serves the unsustainable status quo and business as usual?

D. Obstructing civil society engagement

Not only has civil society been structurally excluded from membership of the CCA's Steering Board and core working groups, consigned instead to a role that only validates decisions made elsewhere. The obstruction of their input stretches further.

For example, there is an expectation that core members of working groups would provide rapid input, equivalent to 0.8 of a full-time equivalent staff member. This is a massive barrier for NGOs, which operate with ever-squeezed budgets and over-stretched staff when compared to the significant budgets of corporate actors. The Commission has not made any funding available to support civil society participation in this specific process.

It has also proven distinctly difficult for some to access the documents of some working groups. Some documents have only been sent out the night before, or even just 20 minutes before a scheduled meeting. This is contrary to the stated "7-Day Rule" where the chairs and vice-chairs distribute the agenda and any draft text to participants one week before the meeting. But it appears that the process is moving far too quickly for those steering the process to adhere to principles of transparency, surely a pre-requisite for effective participation.

Gaining physical access to read the relevant documents for some working groups has also been challenging. For example, while the Commission's cloud server holds working group meeting notes and agendas, CEFIC's data room hosts all background documents and working drafts for working group 1. This is problematic given that the CCA is not supposed to be an industry process and also because not all participants could originally access the documents. A member of working group 1 reported that when they attempted to gain access to the CEFIC-held background documents, neither CEFIC nor the Commission was clear about who should grant them access, and only after multiple requests was access provided.

According to a membership list dated 19 June 2026, of the 293 members listed, 13 were civil society organisations (CSOs), representing just 4.4 per cent of the total membership. But of those at least one is a trade association (according to its EU lobby registration: Asociacion Murciana de Industrias Quimicas) and two are platforms which include, or are close to, substantial commercial interests: the ECRN (European Chemical Regions Network) and the ESPP (European Sustainable Phosphorus Platform). Even if you ignore these these wrong classifications which overstate CSO participation, the Commission's membership figures indicate that industry makes up by far the largest group of members. In total there are 124 companies, 86 trade associations, 20 regional public bodies, 20 national public bodies, 13 CSOs, 9 universities, 6 trade unions, and 15 'others' involved in the CCA. Industry (companies and trade associations) outnumber CSOs 16 to 1.

Considering the obstacles detailed above, perhaps it is not at all surprising that more civil society organisations did not sign up to join the CCA. Additionally, organisations had to agree to a declaration, and certify that they would "work towards achieving the objectives of the Critical Chemicals Alliance … which is the strategic action unit for the implementation of the European Chemicals Industry Action Plan." Those who are critical of the basic direction of the Chemicals Industry Action Plan, or of the CCA itself, could well be reluctant to sign up. Others may have been put off by the Alliance's focus on addressing "key barriers to investments in alternative carbon sources — such as biomass, recycled waste, and carbon capture utilisation (CCU) — as well as low-carbon technologies". These would be a red flag for NGOs who are concerned that these are references to false solutions to the climate crisis.

3. Critical – but for whom?

By creating the CCA, and with this particular structure, DG GROW appears to have abdicated a significant amount of power to the chemicals industry. One NGO confirms this, describing DG GROW's role as "relatively limited and mainly procedural, focused on coordination rather than substantive steering." With CEFIC in the lead, industry looks set to influence EU decision-making on the use of public funds and policy levers to support the chemicals industry. And while the final outcomes of the CCA are not yet precisely determined, there are several highly-concerning indications that it will support business as usual for the existing, highly polluting, chemicals industry.

A. Detoxification agenda – missing

The crucial question of **detoxification** is all but absent from the agenda of the CCA. Instead of the focus on "criticality", the Commission could have focussed on implementing its existing 'essentiality' concept. The essential use concept determines that the most harmful chemicals should only be allowed if their use is necessary for health, safety or the functioning of society, and if there are no acceptable alternatives from the standpoint of environment and health. This would mean defining "criticality" according to essential societal functions – and the materials and goods required to deliver them – whose absence would pose a genuine threat to public and societal interests. Adopting such an approach, the Commission could focus on driving the chemicals industry to transition towards producing safer and more sustainable chemicals. Safety criteria and detoxification demands could be attached to any and all state support for the chemicals industry. This could improve the health and job security of the industry's workers, and likely boost smaller, innovative companies trying to do things better.

But the concept of 'essentiality', the societal value of chemicals, and making public funding conditional on driving detoxification, are not even on the radar of the Commission, let alone those running the CCA process. Instead the CCA seems far more likely to rec-

ommend providing public financial support to the existing chemicals industry. This is the same industry which is largely responsible for the chemical pollution crisis, and has failed to adequately invest in its own infrastructure, instead choosing to prop up short-term shareholder value. It is important to also demand accountability for the private finance and investment decisions that will be needed to fund real solutions at scale.

B. Decarbonisation agenda – misleading

The chemicals sector is by far the biggest energy user of all industrial sectors. It is also a major source of EU greenhouse gas emissions, accounting for around five per cent of the bloc's emissions, making it the third-largest industrial emitter, after steel and cement. Emissions arise from feedstocks, energy-intensive production processes, and waste treatment. Despite this, the CCA's references to **decarbonisation** are misleading, with various 'false solutions' to the climate crisis being promoted by industry, including carbon capture, chemical recycling, and fossil-based hydrogen, with some problematic green hydrogen added into the mix too. These risk providing the fossil fuel industry with ongoing sales opportunities, just when a future-proof EU chemical industry should be heading towards real emissions cuts from energy use and production processes, as well as a clear phase-out of fossil feedstocks towards secondary materials including from mechanical recycling.

The CCA is also talking up biomass as an alternative to fossil-based chemicals feedstock. This ignores the fact that the level of biomass required to replace all current fossil feedstock is totally unrealistic and unsustainable, and the supply of land for biomass needs to considered with other uses such as agriculture. Use of biomass feedstock for the chemicals industry should therefore be carefully measured according to the highest possible overall societal value, and not used to greenwash the non-essential production of harmful chemicals.

C. Reduction agenda – missing

Real defossilisation and detoxification must go hand in hand with **reducing our collective use**, especially of petrochemicals. And yet this agenda is entirely missing from

the CCA. The Center for International Environmental Law recently reported that petrochemicals are a significant contributor to the triple planetary crisis of climate change, biodiversity loss, and pollution, affecting human health and the human rights of communities. The two biggest petrochemical-derived products are plastics and nitrogen fertilisers: in Europe 40 per cent of the plastics produced go into packaging. A petrochemical phasedown is required and we need a "systemic approach" to cut overconsumption across sectors, including plastics and packaging, synthetic fabrics, fertilisers, and pesticides. It would be disastrous if the CCA resulted in increased petrochemical use, building up production in a sector which already suffers from overcapacity, and which is so damaging to our health, the environment, and the climate.

But this concern is entirely absent from the alliance, and its considerations. Troublingly, the plastics industry will now get another boost with the re-launch of the Commission's Circular Plastics Alliance, which will be "complementary" to the work of the Critical Chemicals Alliance. Meanwhile the Commission also proposes that the Industrial Accelerator Act designate the "manufacture of rubber and plastic products" a strategic sector for "industrial manufacturing acceleration areas". Coke, refined petroleum products, chemicals, and chemical products, are also listed. This Act seeks to speed-up and increase industrial manufacturing in Europe, regardless of whether the products and processes are polluting or make any social contribution.

D. Deregulation – boosted

The CCA looks set to give the chemical industry's **deregulation** agenda a further boost. The chemical industry was the sector behind the Antwerp Declaration, and the deregulation of chemicals rules is underway via at least five omnibus packages[2]. Nonetheless the chemicals industry is still not satisfied and is demanding an end to what the German chemicals industry has hyperbolically referred to as the "previous regulatory frenzy" (translation by *Deepl*).

In May 2026 the CCA's working group 3 (on modernisation and investments) surveyed its members "to identify and collect case studies on regulatory hurdles that hamper modernisation and investments in the chemical industry." The survey asked not just about "regulatory hurdles", but also solutions which "catalyse investment". The emphasis in the survey (which covers a multitude of topics including permitting, environmental obligations, and product regulation) however, was on identifying hurdles, and participants were asked to grade them as "showstopper", "major drawback", or "minor drawback". Working group 3 will then draft a "charter" using the survey results, which will focus on

2 The omnibuses on sustainability, defence, chemicals, food and feed, and the environment

"practical, investment-relevant solutions". The survey was exposed in Corporate Europe Observatory's Deregulation Watch, with screenshots available here.

Industry can also count on at least some member states to use the CCA to further promote the deregulation agenda. A February 2026 German Government position paper, provided to ClientEarth through freedom of information, says: "It is important that all [CCA] activities are based on market-oriented principles and are implemented primarily through adjustments to the regulatory framework with the aim of reducing bureaucracy".

E. Where is the CCA now?

The CCA and its working groups are rushing to conclude their workplans before the summer and in time for the second General Assembly scheduled for October, but it has already been decided that it will not produce a list of "critical" sites" itself, apparently because of sovereignty and security concerns. At the time of writing there is also uncertainty about whether the CCA will actually recommend a list of "critical" molecules.

The core group of working group 1 has been developing the CEFIC / PwC methodology to support the future selection of "critical" molecules and sites, and in May-June all group members have been invited to test this methodology on specific molecules. The base list of molecules to be tested has substantially grown and includes highly problematic substances such as titanium dioxide, benzene, butadiene, hydrofluoric acid, chlorine, phenol, styrene, propylene oxide, PVC, polyvinylidene fluoride (PVDF), and other fluorinated molecules. Companies are encouraged to test these molecules along with any additional ones that they deem relevant. Presumably companies will test the methodology on the molecules which are specifically important to them, but doesn't this mean that the overall conclusions will just reiterate industry's self-interested views and preferences? CEFIC's industrial sector working groups have also been mentioned as providing help on this process. Meanwhile working group 1 members have also been asked to express a view, over just two days, on whether all sites producing "critical" molecules should automatically be deemed to be "critical" sites.

The matters being debated within the framework of the CCA are highly important, but the speed, corporate dominance, and marginalisation of alternative voices, look set to deliver an agenda by industry, for industry.

4. Conclusion: Time to silence the clamour of vested corporate interests

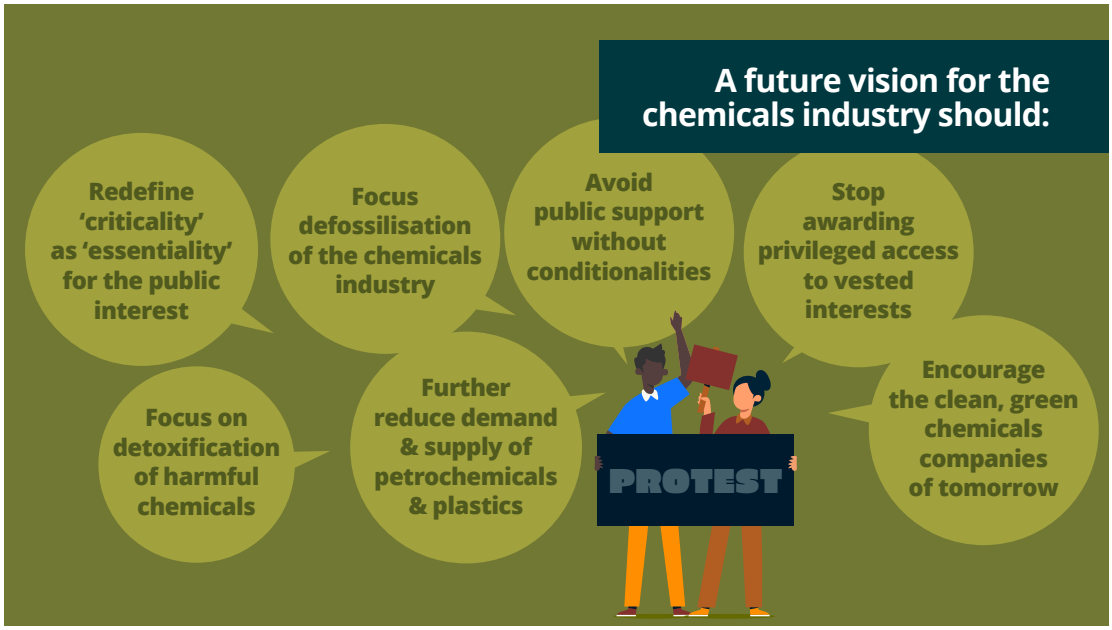
The Critical Chemicals Alliance is moving at great speed, with very little public scrutiny, and has been captured by corporate interests. Large incumbent industry voices are dominating the leadership, governance, and workplans of the CCA, and their significant commercial interests in the outcomes of the process conflict with the public interest. By contrast, smaller innovative companies do not have much voice in the process, while NGOs have been marginalised and face ongoing practical and structural obstacles to their participation. NGOs have formally complained to the Commission about many of these concerns in May 2026, but as of 25 June, little had changed and no written reply had been received.

It is only possible to conclude that the von der Leyen Commission is engaging in a programme of insufficiently evidence-based, insufficiently consulted 'competitiveness' and 'deregulation', prioritising short-term business lobby demands over the needs of people, the environment, and the future. Without a radical and last-minute change of direction, the CCA looks set to deepen this problematic approach, by endorsing yet another corporate welfare wish-list which will, in turn, lead to further environmental and social damage.

Instead of this corporate-led approach, "criticality" should be redefined to be what is essential to the public interest, including both the detoxification and defossilisation of the chemicals sector, as well as the phasedown of petrochemicals, in order to meet the challenges of the chemical pollution and climate crises. An NGO position statement on the need to redefine "criticality" is available here. The chemicals industry should certainly not be bailed-out based on its flawed claim that it is struggling due to reasons beyond its own control. No public funding should be awarded without stringent conditionalities to tackle the climate and pollution crises. Such conditionalities could include no public funding to support harmful chemical production and / or about how much net profit goes into investment, restrictions on profit-sharing with shareholders, or to avoid profit-shifting.

The CCA is an important example of why we urgently need a different approach to regulating fossil fuels and harmful chemicals. A toxic-free politics approach to industrial policy, modelled on the World Health Organisation's restriction of tobacco industry involvement in policy processes, could prioritise the real needs of society and the environment, over the clamour of vested interests.

This could also help with the emergence of the companies of tomorrow: successful producers of cleaner and safer chemicals. Giving into short-term lobbying that defends the status quo risks rewarding the laggards and punishing the leaders. The European chemicals industry currently risks following the automotive sector in losing the fight to produce cleaner products to other countries. EU leaders should think carefully about what the chemicals industry should look like in the decades to come, and make sure that its vision does not compromise people's health and environment.



All documents referred to in this article are available here.

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