

To: **CCA Team**

Bioeconomy, Chemicals & Cosmetics (GROW.F.2)

DG for Internal Market, Industry, Entrepreneurship and SMEs

Subject: Withdrawal from the Critical Chemicals Alliance

Brussels, October 1, 2026

Dear colleagues,

We, the undersigned organisations, would like to inform you of our withdrawal from the Critical Chemicals Alliance with effect from today, 1 October 2026.

We joined the Alliance to contribute to the objectives of strengthening Europe's industrial resilience and competitiveness by identifying genuine societal needs, accelerate safer alternatives, address real supply vulnerabilities and direct investment towards transformed European capacity.

We are leaving because our contributions in the spirit of transformation, climate, health and environmental safeguards and future-proof industry have been systematically sidelined throughout the process, and because the deliverables finalised over the summer go in the opposite direction.

From the outset, NGOs has been excluded from the Alliance's decision-making bodies, while the incumbent industry whose activities are being assessed is structurally (over)represented there. The joint letter of 9 July, addressed to you and signed by 31 organisations, did not receive a reply. The joint position on criticality signed by 20 organisations, grounded in the Commission's own essential use concept, is not reflected in any deliverable. What DG GROW has offered on the deliverables is to record our dissent alongside them.

The final deliverables treat dependency as criticality. They start from existing production and supply dependencies, with no health, environmental or policy-coherence safeguard. As a result, many chemicals that EU policy is seeking to restrict or substitute are identified as critical¹. Every site producing a critical molecule is automatically labelled as critical in turn, and the criticality status for both is meant to stay fixed for, at least, 8 years, whatever alternatives emerge. The policy recommendations then ask for energy-cost support, free ETS allowances beyond 2038, trade protection, fast-track permitting and public funding, without requiring transformation in return. Protecting incumbent production in this way is not a competitiveness strategy, and it would put public money behind production that EU policy is trying to phase out.

Despite having shared our dissenting opinion, recording our dissent would leave these deliverables as they are, and staying would make us party to their adoption on 8 October. The attached briefing, published today, sets out the analysis and an alternative: start from the essential societal function, test alternatives and safeguards before supply risk, assess molecules, production pathways and sites separately, and tie any support to measurable transformation.

¹ PTFE and hydrofluoric acid are among them, while the EU moves towards a comprehensive PFAS restriction

We ask that our organisations be removed from the published list of members, from the working groups, and from the Alliance's distribution lists and CIRCABC. We also ask for written confirmation that none of us is recorded as endorsing any deliverable adopted at or after the General Assembly of 8 October.

We will keep working on the clean transition of the European chemicals industry, and remain available to the Commission on it outside the Alliance.

Yours sincerely,

Tatiana Santos – Head of Chemicals Policy at European Environmental Bureau

Theresa Kjell - Head of Policy at ChemSec