



European Chemical Regions Network

ECRN feedback to the Roadmap for Chemical Strategy for Sustainability

The EU chemical industry can be a key contributor to energy transition, climate change mitigation and to other EU policy objectives, like the circular economy and sustainability. To successfully achieve this transformation, it requires a complete restructure, spanning basic chemicals, specialty and fine chemicals as well as consumer chemicals, i.e. entire value chains. However, given the easily tradable nature of many chemical products and the international nature of the sector, this will only be possible if the competitiveness of the EU chemicals sector can be maintained. For these objectives to be realized - and for the EU chemicals sector to maintain its status as a world leader - EU policymakers must put in place a suitable regulatory environment, in which industrial competitiveness is mainstreamed into all other EU policies (including those on energy, climate, innovation and chemicals safety).

ECRN welcomes a new Chemicals Strategy for Sustainability that will help better protect people and the environment against hazardous chemicals and encourage innovations in the sector to develop safe and sustainable alternatives.

Priority issues and recommendations:

1. Better regulation that will reduce regulatory burden, complexity and unpredictability, will help to maintain EU competitiveness and support investment and innovation.
2. Trade openness ensures an ambitious, balanced, free trade and investment agenda with key trading partners and open markets in general.
3. An innovation friendly environment where chemical industry can develop, test and apply new technologies while ensure protection of the environment and public health as innovation is the most important driver of societal prosperity and is indispensable for sustainable development and economic growth.
4. Digitization is very important for processing industries as the EU chemical industry for their future competitiveness with big data being able to improve manufacturing processes and with less environmental impact through more efficient management of resources, materials and energy.

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5. Circular economy - as the chemical industry and its customer industries might be able to significantly contribute to a circular business model if investment in innovative and economically viable solutions is encouraged, and if policy decisions are based on life-cycle analysis and an overall impact of products on resource efficiency. It is vital to have open access to renewable raw materials at world market prices.
6. Sustainable and renewable biomass has enormous potentials for fossil fuels replacement in the chemical sector, as it contains important biochemicals that can be used to obtain sustainable chemicals. The chemical sector currently represents only 5% of the bio-based economy and 1% of biofuels. It is in particular for bio-based chemicals and biofuels that there is significant potential for bio-based growth. Increasing the use of biomass doesn't necessarily require using up agricultural resources, since organic waste is a largely untapped source of biomass.
7. Bio-based products (e.g. paper, wood, bioplastics and biochemicals) already create five times as much added value and ten times more employment than bioenergy. Almost half of the total gross margin from the bio-based economy is generated by fine chemicals, biopolymers and bioplastics. Completely new chemicals with new, special properties can be produced from biomass. To upscale the use of biomass in chemistry, a stronger link with the agricultural sector and other sectors is important, to make sure that the biomass has sustainable origins, and its use is sustainable, in accordance with the cascade principle.
8. A fully circular chemical industry will need to: reduce the use of raw materials by using more selective chemical conversions, which also yield fewer or no by-products; invest in new technologies that limit the use of raw materials and the production of waste; increase the recovery of valuable raw materials from residual products.
9. The EU should allocate EU funds to innovations aimed at preserving and developing new business models to stimulate the bio-based chemical production and stimulate the market for sustainable biobased products with adequate policy-related and stimulating measures.
10. Green hydrogen, produced from renewable energies, is a key component for success of the EU energy transition as it will have a decisive role in decarbonising heavy industries, such as the chemical industry, without jeopardizing economic growth, the competitiveness of our companies or our social prosperity. Investing in green hydrogen support the creation of green and sustainable manufacturing capacity in Europe.

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