



The European Green Deal Chemicals Strategy for Sustainability

The European Green Deal is meant to lay the foundations for a sustainable EU and promises nothing less than a major transformation of the European economy. The new growth strategy is intended to show Europe the way to a modern, resource-efficient and cycle-oriented economy while increasing its competitiveness. All this under the premise of climate neutrality by 2050. These extremely ambitious goals come with a strong pressure for change which will lastingly transform European industry.

Zero pollution ambition

A central element of the Green Deal is the zero pollution ambition to protect humans and the environment. The EU Commission sets the course with the publication of its Chemicals Strategy for Sustainability (CSS).

Chemicals Strategy for Sustainability

In the CSS, the Commission pursues the goal of an “inherently” safe and sustainable use of chemical substances. A disproportionate tightening of the existing chemicals regulation, which is deemed the strictest and most progressive world-wide, is planned for this purpose. Over 80 individual measures are to be implemented by 2024, and highly complex issues on chemical substances are to be addressed.

The above includes, inter alia, the introduction of a generic hazard-based approach in risk management – which is not only less scientific than a risk-based assessment, but is also to abolish

the important distinction between professional and private users of chemical products.

The introduction of new hazard classes and digitization projects in the CLP regulation, the planned consideration of combination effects in the formulation of mixtures, and the definition of “essential uses” of substances classified as hazardous are also central elements of the CSS.

All in all, the various measures of the CSS, some of which are scientifically controversial, are likely to result in a significantly limited selection of chemical substances. However, a broad range of raw materials is a basic prerequisite for paints, coatings and printing inks to deliver the required performance and fulfil their functionality. Due to the particularly high diversity of substances and formulations in the coatings and printing inks industry, massive effects in the form of complex formulation adjustments are to be feared. It can therefore be assumed that implementing all CSS measures will lead to less sustainability.

**This is
what
we are
calling
for**

✓ Science-based and practice-oriented discourse

Regulatory decisions must be based on robust and science-based assessments. Generalised, hazard-based approaches do not achieve their goals. A practicable implementation within scientific limits must be the goal. The existing chemical legislation already enables to achieve CSS targets.

✓ A broad base of chemical raw materials

Manufacturers of paints, coatings and printing inks depend on a broad base of chemical raw materials to ensure that high-quality, specialised coating products remain available in the usual variety in the future to perform sustainability functions.

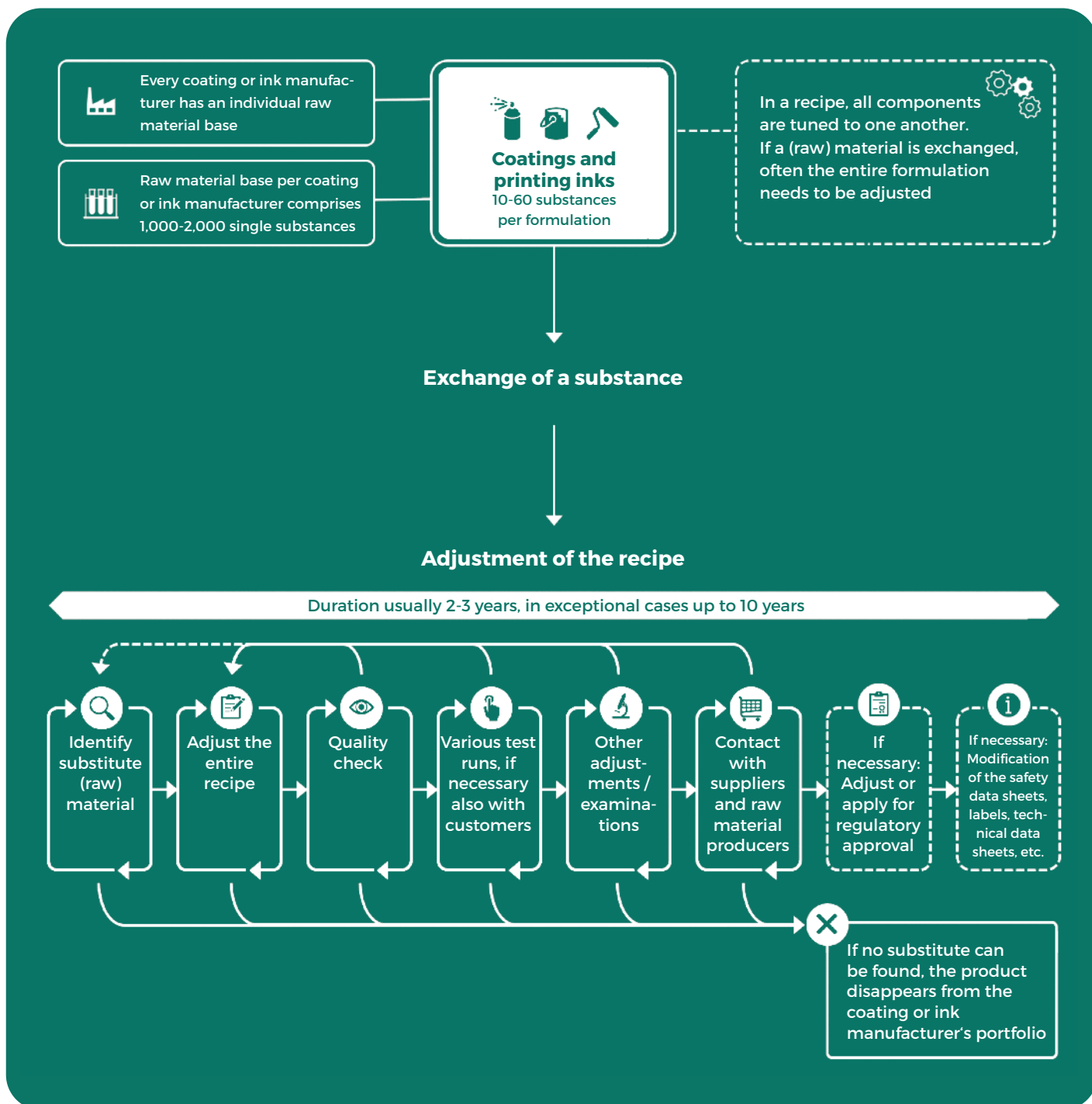
✓ Utilise the innovation potential of the industry

The massive effort involved in replacing substances in paint formulations, which is to be feared, is lengthy and complex. This ties up resources and inhibits industry innovation. However, to achieve the goals of the Green Deal, the full potential of the industry is required.



Substitution of substances in coatings and inks recipes

A lengthy and costly process



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