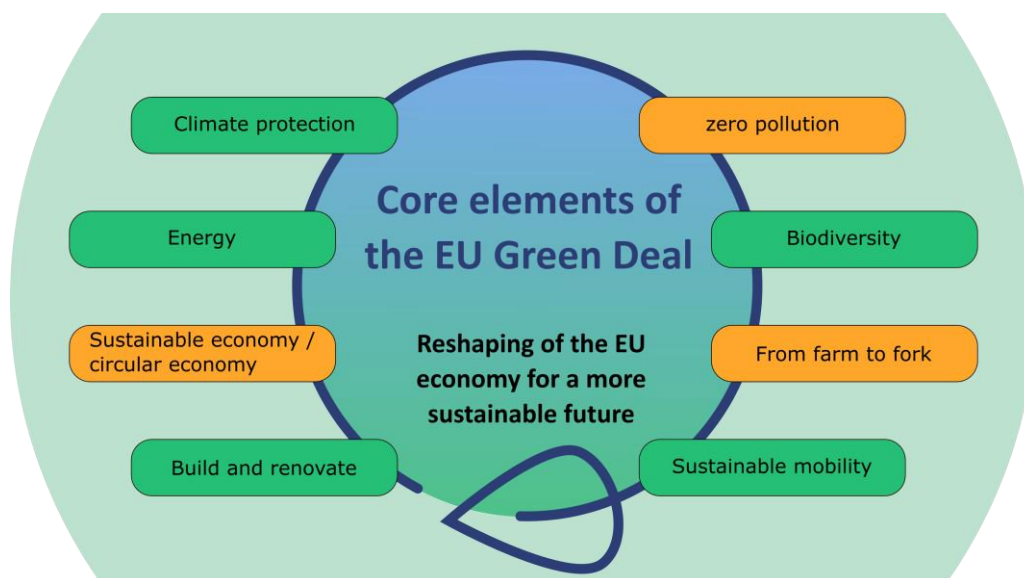


VdMi brief information on the EU Green Deal

The EU Commission announced the Green Deal as one of its priorities and as a central action plan for EU climate policy on 11th December 2019.¹ As part of the Green Deal, Europe should no longer emit any greenhouse gases by 2050 and thus become the first climate-neutral continent. In order to achieve this ambitious goal, no fewer than 47 individual measures have been announced, which entail various changes in the law, which will also have far-reaching and lasting consequences for the chemical industry. Therefore, it is only superficially about fighting greenhouse gas emissions. There are eight political storylines / areas in focus, including circular economy, a pollution-free environment and healthier and sustainable food. These topics have already been pushed in the last 12 months by numerous strategy papers and initiatives and have thus been given initial outline.

It shows that these will have considerable consequences for the chemical industry and thus also for the VdMi member companies. Thus, this is a top priority issue for VdMi as well. We would like to briefly describe to you what we believe to be the most important areas of the Green Deal.



From Farm to Fork

The EU Commission published the strategy “From farm to fork” on 20th May 2020.² It aims at a fair, healthy and environmentally friendly food system and considers the entire food chain, i. e. from production to transport and distribution to marketing and consumption. The aim is to enable consumers to eat more healthily through expanded labeling and better food. Manufacturers of processed foods should be motivated to revise their recipes.

This also includes food and feed additives and packaging for food. Thus, all manufacturers of e. g. food colours and additives, pigments, fillers, colorant preparations and masterbatches that deliver their products in these areas are affected. Specifically, it is mentioned that the regulation for feed additives is to be revised. The EU legal framework for food contact materials is also to be revised in order to improve food safety and public health; this is to be achieved in particular by

¹ See also [EU Commission's Homepage](#).

² See also Homepage of the [From Farm to Fork strategy](#).

reducing the use of hazardous chemicals. The use of sustainable types of packaging, which are especially reusable and recyclable, will also be brought into focus.

Basically, there is a risk of prejudice of certain substances due to the planned measures since food is a sensitive application.

Zero pollution, chemicals strategy for sustainability

The chemicals strategy for sustainability is an essential part of the EU Commission's goal for a pollution-free environment (zero-pollution goal); it was published on 14th October 2020.³ It bundles numerous measures for environmental and health protection, which are intended to further increase the safety of citizens and the environment through chemical management. At the same time, innovations for safe and sustainable chemicals are to be strengthened. The implementation of a total of 54 proposed measures, which are planned over a period of 4 years, has far-reaching consequences for almost all companies that produce and process chemical substances and their customers: There is a risk of extensive tightening due to changes to REACH and CLP Regulation that should start in 2021.

The focus is still on consumer products. Concrete measures are mentioned in a wide variety of regulations, e. g. in the regulatory area on cosmetics, food contact materials and toys. There is a threat of blanket bans on the use of chemicals in consumer and consumer-related products. Various legal regulations on environmental protection (e. g. industrial emissions) and occupational safety are also to be revised. The long announced revision of the EU recommendation for a nanomaterial definition is now part of the chemicals strategy and planned for 2021.

First Evaluation: Focus solely on precautionary principle

The EU chemicals strategy is based on the precautionary principle and the approach that the dangerous property of a substance is decisive and neglects any consideration that there is generally only a risk when there is exposure to a hazardous substance. It is not taken into account that the chemical industry has good experiences and know-how on handling of chemicals classified as dangerous and using them safely for many years

Terms such as “safe and sustainable chemicals” or “essential use” are introduced and brought to focus without having a precise definition or idea of what these mean. This makes it almost impossible for industry to assess concrete consequences.

If the proposed measures are implemented in this way, this would have considerable consequences for the manufacturers and users of chemicals and mixtures as well as for the entire processing chain. A detailed consideration and evaluation of the chemicals strategy for sustainability and the measures can be found in our VdMi paper **The new EU chemicals strategy for sustainability – First evaluation of the VdMi regarding opportunities and risks for the industry.**⁴

Sustainable economy / circular economy

The European Commission presented a new action plan for the circular economy as part of the European Green Deal on 11th March 2020. In this field of action, the EU Commission is pursuing the goal of an improved waste policy to promote waste prevention and the circular principle. A central tool should be a new framework for sustainable products. The focus here is on material savings in design and the consistent recycling of products. The action plan contains seven fields of action from which a total of 35 measures such as initiatives, legislative measures, reviews and tightening of existing laws, proposals for legal frameworks, targets, regulatory measures, and much more are derived. These include:

³ See also [presse release of the EU Commission](#).

⁴ [Download](#) available on VdMi Homepage.

- The restriction of microplastics and measures to reduce the unintentional release (so-called pellet loss)
- The minimization of the presence of substances of concern in recycled materials (e. g. first activity to record articles with SVHC substances in the SCIP database) and products made from them
- The policy framework for bio-based plastics and biodegradable or compostable plastics
- The review of the directive on dangerous substances in electrical and electronic equipment and its connection to REACH and eco-design requirements
- The review of the end-of-life vehicle directive.

These measures are to be implemented within the next three years. The VdMi member companies will also be directly affected by the majority of these actions.

Conclusion

The EU Green Deal, at whole, promises nothing less than a major transformation of the European economy. The multitude of measures and the rapid pace with which the EU Commission has presented its strategies and papers in recent months, leaves little time to wait. The focus is on climate protection but also the considerations on the circular economy and in particular the chemicals strategy for sustainability will have considerable effects on the chemical industry and thus also on the VdMi member companies: If this remains unchanged, there will be massive additional costs and bureaucracy, especially in the view of increasing compliance costs in the regulatory area. This goes hand in hand with a reduction and deterioration of the available substance base. While many new innovations are to be promoted, which in the future should protect human health and the environment in the long term, it is to be feared that essential raw materials will be lost and safely used substances can no longer be applied.

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