

## “New Commission, New Approach” - Assessment from Eurocolour’s perspective

*In the last couple of years, the chemical industry was presented with the implementation and effects of the “European Green Deal”. More than 150 regulative measures were announced, which will change the landscape for the industry. About 900 implementation measures already affected the chemical industry. Most of these measures significantly increased the bureaucracy burden for the industry and there are other revisions that have been announced but have not yet been implemented (e.g. REACH).*

*Immediately after the election of a new European Commission, new Guideline documents were published, explaining future approach on legislation. A “new chemicals industry package” with the goal of “making business easier” and “reducing administrative burdens and simplifying legislation” is announced. The publication of the Commission’s Workplan for 2025 and the launch of the Clean Industrial Deal on 26 February 2025 have further underlined this.*

*To combine the Commissions goal of “a more circular and resilient economy” with the “new chemical industrial package”, the regulations introduced under the Green Deal as well as those to come need to be critically reviewed and, if necessary, revised.*

### Key Messages:

- **Maintain Risk-based Assessment**
  - Do not move away from already existing and working systems.
  - Blanket bans should be avoided as they lead to unjustified restrictions on substances
- **Keep Legislation Clear and Simple**
  - Reporting obligations should be significantly reduced
  - No multiple regulations based on different definitions for substances deemed as dangerous
- **Streamline Regulatory Landscape**
  - No adoption of new regulations before implementation of existing regulations is concluded
- **Improve Industry Collaboration**
  - Better communication between the Commission and industry is needed.
  - Legislative changes must include impact assessments as a whole and in the entire supply chain.

## Background

The EU industry is on its way to a climate-neutral and more sustainable economy in Europe. The Green Deal, introduced in 2019 by the EU Commission, greatly enhances the burden of bureaucracy while often not significantly increasing the protection of health and environment.

Together with the announcement of a new chemicals industry package, the Clean Industrial Deal was published on 26 February 2025. This deal pursues several key points from the Political Guidelines “Europe’s Choice”, and the Mission Letters from the Commission President, Ursula von der Leyen, to the Commissioners designated. These Guidelines contain several statements of the Commission that give hope for a change in direction for the EU Commission period 2024 – 2029. Particularly relevant are the following statements of the Commission:

- The Commission will make proposals to simplify, consolidate and codify legislation to eliminate any overlaps and contradictions while maintaining high standards.
- *The Commission must focus on **implementing the existing legal framework for 2030** – in the simplest, fairest and most cost-efficient way.*
- The Commissioners will ensure that existing rules are fit-for-purpose and focus on reducing administrative burdens and simplifying legislation. The Commissioners must contribute to reducing reporting obligations by at least 25% - and for SMEs at least 35%.
- “The Commissioners will organize at least two Implementation Dialogues per year with stakeholders to align implementation with realities on the ground.”
- “The Commissioners will ensure the principles of proportionality, subsidiarity and Better Regulation are respected, including through wide consultations, impact assessments, a review by the independent Regulatory Scrutiny Board and a new SME and competitiveness check”.
- “Proposals must be evidence-based and the Joint Research Centre, our internal scientific service, can support in that work.”

Additionally, in their Clean Industrial Deal the Commission announced the Chemical Industry Package to be presented in Q4 2025, bringing more certainty to the chemical sector. This chemical package will complement the actions already announced on access to affordable energy, secure access to materials and resources, as well as public and private investments.

## Eurocolour Position and what needs to be considered

The Political Guidelines and measures outlined in the Clean Industrial Deal are a necessary step in the right direction and put the focus back on the competitiveness of our industry. Eurocolour has already identified various problems for the chemical industry combined with the global crises.

Eurocolour e. V.

Mainzer Landstraße 55  
60329 Frankfurt/Germany

Phone: +49 (0)69 - 2556 - 1351  
Fax: +49 (0)69 - 2556 - 1250

www.eurocolour.org  
contact@eurocolour.org

The EU Green Deal was conceived and planned at a different time and under different conditions. The original objective to protect our climate is still fully supported by Eurocolour, but it is a global task which cannot be achieved by the European Union alone. At the same time, more weight must be given to the other goals like “no person and no place left behind” and the Economic growth using available resources (e.g. human capital, technology).

If everything planned is implemented correctly and the Mission Letters are not only for show, the first step is taken to give the European Industry a chance to be competitive. To achieve this goal, we request the following points to be considered:

- **Do not move away from already existing and working systems like the risk-based approach.** Moving away from the risk-based assessment would ignore the safe handling of chemicals achieved in the last decades. Only with this risk-based approach the overarching goals of the Green Deal are reachable, as many of the substances classified as hazardous are necessary. Furthermore, it would increase the administrative burden on companies and authorities as the new system will have to be introduced without having any additional benefit, as a good system is already in place.
  - o **Blanket bans should be avoided as they lead to unjustified restrictions on substances.** Blanket bans prejudge substances and includes substances that do not need to be restricted, often based on broad categorisations and hazard information only. These types of bans also further increase the workload and administrative burdens for companies as well as the Commission, as it requires to identify and evaluate every single use of a group of substances, independently of their specific safety. This was shown, e.g., with the proposed PFAS Restriction.
- **Keep it clear and simple.** Only if manufacturers are given clearly defined, achievable goals in a manageable legislative framework will they be able to work towards the set objectives. Otherwise, the process will not only create enormous bureaucracy, but also hinder the advancement of the industry towards the goals of the Commission.
- **Reporting obligations should be reduced.** Some obligations are already in place and, together with the upcoming ones, present a big challenge for the industry and are particularly detrimental for SMEs, which often do not have the capacities or financial resources to meet all of them. These obligations should therefore be reviewed and, if necessary, cut or streamlined in order to achieve the prescribed reduction of reporting obligations by at least 25% (35% for SME). Some steps have been taken by the Commission to reduce the burden. Most notably is the omnibus procedure which aims to lessen the burden especially for SMEs concerning the EU Taxonomy, CSDDD and CSRD.
- **No multiple regulations based on different definitions for substances deemed as dangerous.** The scope of substance definition differs from regulation to regulation, which leads to confusion and in particular legal uncertainty. This also effects the different but very similar definitions for substance of concern, substances of very high concern...; To clear up some of these double definitions, a single definition would be necessary. This could easily be achieved by taking already published definitions into

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contact@eurocolour.org

consideration when publishing a new regulation. Depending on the focus of specific regulations, additional paragraphs could be added.

- **No adoption of new regulations before implementation of existing regulations is concluded.** The primary focus of the Commission should be on the implementation of already published regulations and not on the introduction of new ones. The current landscape needs to be sorted out first as it is already complicated enough.
- **Better communication between the Commission and industry is needed. Legislative changes must include impact assessments as a whole and in the entire supply chain.** The Green Deal or the planned Industrial Deal can only be implemented when the communication between the Commission and the industry is working properly. Therefore, the announced annual meetings between the legislators and the industry are welcome and necessary. These dialogues should be used as a basis for determining which regulations are functioning and which are dead weight. The meetings should be seen as a chance to improve the system. This collaborative approach is also necessary for the impact assessment as an important step in the examination of any new regulation: At present, it is completely ignored that many new obligations will affect manufacturers in their entirety at once, with a combined impact that is much higher than the one predicted by impact assessments developed for individual initiatives alone. In the future, an impact assessment must also consider the consequences for the value chain.

**Your contact partner at Eurocolour:**

Dr. Heike Liewald, Managing Director  
[liewald@vdmi.vci.de](mailto:liewald@vdmi.vci.de)

Marco Silbach  
[silbach@vdmi.vci.de](mailto:silbach@vdmi.vci.de)

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*About Eurocolour:*

*Eurocolour e. V. is the umbrella association for manufacturers of pigments, dyes, fillers, frits, ceramic and glass colours, and ceramic glazes in Europe.*

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