



**Fecc**  
EUROPEAN ASSOCIATION OF  
CHEMICAL DISTRIBUTORS

# EU Consultation: Sustainable products initiative

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European Association of Chemical Distributors (Fecc)

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[www.fecc.org](http://www.fecc.org)

Fecc supports Sustainable Products Initiative roadmap and the measures proposed to assess the presence of certain chemicals in products present in the EU market. In this context we would like to raise the following points on behalf of the European chemical distribution sector and in particular the many SMEs we represent:

- **The synergy between the Sustainable Products Initiative and the Chemical Strategy for Sustainability (CSS) should be put into perspective.** When the CSS was published last 14 October 2020, one of the Commission proposals in the strategy was to extend the generic approach to risk management and ensure products do not contain persistent substances. This general approach in the CSS defeats the purpose of the Sustainable Products Initiative in improving the durability of EU products as a number of polymers synthesized are inherently persistent in order for durability to be a key component during its production. The industry supports the innovation opportunities that these strategies present but in order for this to be met, Fecc requests the Commission to consider the necessary steps to ensure that products are both safe, durable and sustainable via this initiative.
- **Fecc supports both a sustainable supply chain and business model.** The EU and other national governments are currently offering various regulatory and financial incentives for “green initiatives”, particularly for academic stakeholders and start-ups. With the EU Green Deal being a game-changer, support from the community must include a wider part of the industry in order to ensure that sustainable products manufactured en-masse are valorised. A main issue for the European chemical wholesale sector is the cost to manufacturers and distributors due to overlapping regulations. Fecc requests the Commission to consider the effects of these overlaps on the level playing field for industry, in particular for SMEs, with the target to clear them to reduce complexity in line with the Commission's Better Regulation agenda.
- **EU Sustainability requirements should be further monitored and enforced at external EU borders.** The EU expects high-quality and durable products from its local manufacturers and the same should be expected from all third countries that conduct trade with the EU. Fecc calls on the Commission to enhance the monitoring efforts when it comes to EU sustainability requirements that may be proposed in this initiative. Setting up an additional requirement without the comprehensive surveillance of third country imports and consistent enforcement rules results in: (1) the undermining of EU-based producers and service-providers, (2) the decrease of the EU market share and (3) unnecessary regulatory roadblocks due to an uneven level playing field.

Fecc acknowledges that the Sustainable Products Initiative, along with the other EU Green Deal strategies, signals a regulatory paradigm shift for the European Chemical industry. Fecc and the distribution sector see this also as an opportunity to further promote safe and sustainable innovation, if it can be implemented in a pragmatic and cost-efficient way without compromising the overall targets.

We look forward to further working with the Commission to establish a coherent regulatory framework and ensure that sustainability is not only an option, but rather the norm.

To access the Fecc's response on the EU Commission's website, please [click here](#).