

Reflections on the CCA Process

Input for DG GROW & Steering Group Consideration ahead of the October GA

07/09/2026

We would like to begin by acknowledging the substantial progress achieved by the CCA within a genuinely demanding timeframe. Bringing together industry, associations, Member State and regional representatives, civil society and other stakeholders across four Working Groups and moving towards broadly supported outputs in this first cycle is a real achievement. The results provide a solid basis for further policy development and for better alignment of existing regulatory and industrial-policy frameworks with the sector's forward-looking transformation needs. With the announced General Assembly in October and a possible update of the mandate ahead, we would like to flag a limited number of aspects that the Steering Group and DG GROW may wish to consider.

Limited coverage of the CCA's modernisation objective

CCA is focusing, on the one hand, on how to maintain chemical production and jobs in Europe today, and on the other hand, on modernisation, decarbonisation, and lead markets for defossilisation. Modernisation is key to sustaining competitive chemical production in Europe while supporting cleaner and more efficient processes. This in turn helps secure the industrial base needed for strategic applications, including green technologies that enable decarbonisation and broader sustainability objectives. In practice, however, much of the Working Groups' efforts concentrated on maintaining chemical production and existing infrastructure. That focus is understandable given closure risks, but it should be matched by equal attention to how EU production can become competitive, sustainable and strategically autonomous in the mid and long term.

The policy question is not whether Europe should retain high-volume production, but how it can renew that production while reducing fossil-feedstock dependence and scaling complementary routes. Sustainable-carbon pathways – including bio-based, recycled-carbon and CO₂-based feedstocks, hydrogen, methanol and ethanol routes, biotechnology, electrochemistry, chemical recycling, Power-to-X and other low-carbon processes, as well as battery chemistry – received less systematic engagement than their potential warrants. Key barriers include high first-of-a-kind costs, uncertain demand and lead markets, access to affordable energy and sustainable feedstocks, permitting, and a lack of predictable scale-up support as well as missing policy support (for example no demand creation).

The CCA would have had the opportunity to identify the real barriers to transformation with leading experts and to develop instruments and specific measures to pave the way for sustainable, fossil-free, cutting-edge investments. Only in this way can Europe's "long-term needs" be addressed in earnest, alongside the rapid implementation of "modernisation is key". Will Europe's brand manufacturers favour optimised fossil products from Europe over bio- or CO₂-based products from China in future? Europe must regain its position at the forefront again; improved steam crackers are not enough. An expanded mandate would enable these questions to be consistently addressed and draw on the knowledge of all the experts. What should a new European chemistry look like, and how can it be implemented?

Stakeholder representation

The Alliance has formally brought together associations, public authorities and companies. Nevertheless, the core group compositions were skewed toward established, mainly fossil-based large-scale producers and their associations. Downstream brands and formulators, sustainable-carbon feedstock providers and users, emerging technology companies, manufacturers of safer chemistries, SMEs and NGOs were unfortunately structurally underrepresented. SME and NGO participation in core groups was particularly limited. This is not only due to formal access, but because sustained, high-intensity and technically demanding participation is difficult for actors with limited resources. A revised mandate should build in provisions for balanced value-chain representation and provide lighter routes for observers and technical contributors without compromising pace and efficiency within the full working groups.

Process integrity – some outcomes appeared pre-settled rather than genuinely deliberated

In a first-cycle process operating under considerable time pressure, preparatory proposals and early scoping were necessary to make progress. However, in several Working Groups, starting assumptions and methodological choices were not always visibly reopened or tested against alternative approaches. As an example, in WG3, steam crackers and ammonia were set as starting points with other pathways “*to follow*,” but the core group never genuinely broadened beyond them. In the WG1 methodology, the limited methodologies and “*critical molecules*” were pre-chosen by the Chair and Co-Chair (Cf. CEFIC proposal and France-Chimie proposal - acting on behalf of the French Government) before the start of the working group, and finally, sustainability considerations added after significant input from some stakeholders during the discussions were largely removed from the final core assessment criteria, with the innovation fast-track left as the only route back in.

There was little discussion about shorter versus longer term needs for the industry in Europe and how actions to address short term challenges for the industry could affect the long term investment of more sustainable chemistries and manufacturing processes. Participants also experienced informal consensus checks, limited visibility of voting distributions, and substantive disagreements entering the analysis relatively late. This should be treated as process learning rather than criticism of individual chairs. A revised mandate should build in a clearer, more traceable process for how disagreement and consensus are actually assessed and documented.

Governance and stewardship

Shared ownership by Working Group chairs and actors across the value chain is a strength: it avoids leaving responsibility solely with Commission officials and can improve practical relevance. In future phases, DG GROW could nevertheless set the strategic frame more clearly, ensure continued alignment with the CCA mandate and wider EU objectives on competitiveness, decarbonisation, defossilisation, circularity and zero pollution, and intervene where a workplan becomes materially narrower than agreed.

We would also flag limited visibility across Working Groups. It was often unclear how the outputs of the four groups were meant to align, whether overlaps were being reconciled, or whether shared strategic objectives were emerging. An updated mandate would benefit from a clearer coordination mechanism between WGs (or communication thereof), more active Commission stewardship to guide the actual realisation of the mandates, and greater transparency in how consensus is actually assessed within groups.

Finally, the mandate would be strengthened by establishing clearer links between the work of the CCA and relevant EU policy processes and concrete policy outputs. This would help ensure that the Alliance's recommendations can effectively feed into policy development and implementation, rather than remaining stand-alone recommendations.

Timeline and workload predictability

The urgency behind the CCA is understandable and widely accepted. For a first iteration, some experimentation and adjustment were inevitable. Observed frictions were less about speed itself than about the unpredictability of workload and turnaround expectations, an inadequate process which limited members' ability to engage substantively with each other's input. Future phases should give participants clearer visibility into expected effort, workplans, milestones, and deliverables up front. Clear, fair, and transparent processes are critical to this.

WG-specific considerations

WG1: Criticality criteria

The final approach usefully combines a standard criticality methodology with an innovation fast-track. Emerging sustainable products and technologies may qualify through the standard methodology, the fast-track, or both, depending on their maturity and evidence base; the fast-track should therefore not be presented as the sole route for recognition. Unfortunately, WG1's recommendations deliverable gives limited attention to the innovation fast-track, weakening the tools' ability to drive the acceleration these molecules need. For sites, which are considered critical if a molecule produced was considered critical, a facility could in principle be assessed as "critical" independent of any sustainability performance or compliance with relevant laws. We recommend the revised mandate extends sustainability and transition-relevant criteria more consistently across the core methodology, consistent with other European priorities around decarbonisation, circularity and zero pollution, and ensure sites are assessed on their role in feedstock transition and novel value chains, not only current output.

WG3: Future orientation

The final charter incorporates meaningful language on defossilisation, modernisation, and low-carbon and sustainable carbon products which we welcome. Still, the dominant signal remains defensive: preserve existing infrastructure first, transformation second. A more balanced mandate should treat resilience and transformation as mutually reinforcing. Novel pathways – such as electrified or green methanol and ethanol routes, Power-to-X, CCU, and bio-based or recycled-carbon processes – or solutions like bio-based PLA, FDCA/PEF or PHA remain underexplored, with little concrete guidance on scale-up support for innovative and sustainable solutions. A revised mandate should include balanced representation of established assets and emerging routes in the working group composition. It should also provide concrete direction on demonstration, scale-up, and first-of-a-kind finance, CAPEX and OPEX support, energy and feedstock infrastructure, permitting, and demand-side or lead-market measures. Given the upcoming Multiannual Financial Framework and the EU Taxonomy Revision, WG3's output could meaningfully shape future investment priorities, but only if these transformation elements are carried forward alongside the infrastructure-resilience elements.

WG4: Sustainable carbon definition and follow-through

WG4's outcome is a strong basis for further work on lead markets that enables the deployment of low-

carbon and sustainable carbon products. CCA recommendations should be visibly reflected in files such as the Biotech Act II, the Circular Economy Act or the Industrial Accelerator Act, so that the exercise translates into real impact. Safety criteria would enhance the utility for downstream users, particularly in consumer product verticals where both safety and sustainability are critical criteria. Finally, scope 3 emissions along the value chain also require an implementation roadmap with a clearer timeline, given their growing weight in investment and competitiveness decisions.

Overall direction for the next phase

Taken together, we believe our suggestions would preserve the pace and practical strengths of the CCA while making its next cycle more balanced, transparent and forward-looking. The objective is not to reopen completed work, but to build on the achieved so that the Alliance protects strategic capacity while accelerating a competitive, safe, circular and climate-neutral European chemicals sector.

This public letter is developed and/or supported by the following stakeholders involved in the CCA



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