



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

EU Consultation: Export and import of hazardous chemicals – review of the list of chemicals subject to international trade rules

European Association of Chemical Distributors (Fecc)

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Fecc acknowledges the consultation on Export and import of hazardous chemicals – review of the list of chemicals subject to international trade rules ([link](#)) and welcomes the opportunity to provide input. In this consultation we would like to raise the following points:

- 1. Fecc supports the legislative initiative** that aligns EU regulations with international standards, ensuring that the EU chemical industry operates on a level playing field with global competitors. This harmonization reduces trade barriers within the EU and enhances the competitiveness of EU-based chemical distributors globally. Simultaneously, it demonstrates the EU's commitment to protecting consumer health and the environment.
- 2. Market Dynamics and Supply Chain Disruptions:** The Commission should consider the impact of new regulations on market dynamics and supply chains. While the initiative can strengthen the Single Market in the long term, there might be short-term disruptions as businesses adapt to new regulations. The Commission should provide transitional support and clear communication to mitigate these disruptions, ensuring that businesses can adjust smoothly without significant economic impact.
- 3. Financial Implications:** The initiative encourages the chemical industry to innovate and develop safer alternatives to hazardous chemicals. By promoting research and development in sustainable practices, the EU can position itself as a leader in green technologies and sustainable chemical production. Acknowledging the financial implications for compliance, the Commission could explore funding opportunities or incentives for investing in compliance systems, staff training, and product reformulation. Supporting the industry financially will encourage adherence to regulations and promote sustainable practices.
- 4. Balancing Regulation and Essential Uses:** The Commission must carefully balance regulatory measures with the essential uses of certain chemicals. Overly stringent regulations without considering the practical applications of chemicals could hinder certain industries. By adopting a risk-based approach and consulting with industry stakeholders, the Commission can develop balanced regulations that protect health and the environment without stifling economic activity.

Fecc represents chemical, food, and active pharmaceutical ingredients distributors, most of which are SMEs. The objectives of this initiative are commendable, and we support efforts to prevent unwanted imports and ensure the exchange of information on hazards, risks, and safe handling when these chemicals are exported. We believe that a collaborative approach between the Commission and the industry will lead to the successful implementation of these regulations. We would be happy to engage further with the Commission to pursue sustainable, environmentally friendly, and safe solutions in this area.

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