

7 October 2025

ChemSec feedback on EU network of substitution centers

As participants at the workshop on a (network of) EU Substitution centre(s) held September 18, 2025, we were given the opportunity to provide written comments. Please find below our replies to the provided questions:

4. Which of the four proposed centre options do you consider most effective and why?

Options: (1) Central hub, (2) Network of centres, (3) Hybrid model, (4) Technical support centres. Please explain your reasoning and highlight important structural features.

Option 2 (a Network of centers) is most efficient, because:

- Hands-on-practical guidance to support companies' substitution of hazardous chemicals is needed and local/regional hubs are most efficient in reaching out to companies on the ground.
- It's an impossible task for a centralised center to reach-out with hands-on support to companies across EU and across sectors. It would require a significant budget with a lot of staff to make a real difference on the ground. It's unclear how such center would be financed.
- "Coordination" of a network is not a main issue and could be solved by a web portal that facilitates the information sharing and networking by the independent centers/hubs. A desk officer from the Commission can act as a point of contact to inform about related EU news and about funding that might be available to support companies with substitution.
- There is no justification for setting up a costly and bureaucratic central structure suggested in the workshop background document. We don't support the creation of a new Governance structure and see no need for an advisory board, suggested in the workshop background document (see reply to questions 5 and 6). The work of substitution support center(s) should be entirely **voluntary**. The resources of Member States should focus on their important role to regulate the most harmful substances: Identification of substances for phase-out and prohibitions with clear timelines are the most important driver for substitution and innovation in safer alternatives. It ensures a level playing field and a clear framework for all companies in the single market.

5. Which activities should be prioritised by the centre(s) and why?

Share your suggestions for priority activities and their potential impact.

- To make substitution of hazardous substances happen in practice, the main task should be to support companies on the ground, in particular SMEs. Tasks include outreach activities, arrange webinars, raise awareness about available information and hands-on tools for substitution, share good examples, and so on.
- Each company must decide on how they substitute, e.g. be responsible for which alternative to choose and avoid that this is “regrettable” (alternatives can range from drop-in chemicals, new material, technology or abandon the product in favor of something else that makes sense for their business model). The company decide whether to be proactive or reactive to regulatory requirements (stay ahead of legislation, or wait until legislation is a fact and they must be compliant).
- Each substitution case is unique, and there shouldn't be any limitations regarding voluntary solutions, substitution strategies and tools. It's important and welcomed with diversity in this regard, considering the variety of needs of companies of different sizes and sectors (one solution is rarely the best for all companies). Therefore, we see no need for centralized advise, impose harmonized methodologies or to make “public alternative assessments”, which risk creating a lock-in effect on the choices of alternatives (see bullet above).

6. How can existing bodies or initiatives best be leveraged?

Suggest ideas for collaboration or synergy with current organisations.

- The work of substitution support center(s) should be entirely **voluntary** and not be linked or integrated into the regulatory frameworks of hazardous substances or products in the EU. It should not mix roles and responsibilities of existing regulatory bodies and stakeholders. This means that the center(s):
 - Must **not** have a role in legislative processes
 - Must **not** take the role as “advisors” for policy-makers (as suggested in the Table in the Workshop Background paper).
 - Must **not** take decisions on alternatives assessments
- The centers can seek cooperation with voluntary sectorial initiatives.
- Existing voluntary initiatives and supporting tools, such as ChemSec SIN List and ChemSec Marketplace, can be used by the network.

7. Any additional comments or suggestions?

Share any other feedback or recommendations.

Substitution support to companies is a welcomed **complement** to hard chemicals legislation but can never replace regulatory action. The main driver for substitution of hazardous substances in the EU is regulation, which has been shown several times (e.g. ECHA (2020). *Impacts of REACH restriction and authorisation on substitution in the EU*). Supportive voluntary policy instruments can reinforce the regulatory drive, but they don't give the same predictability, enforceability, level playing field and cost sharing in the supply chain like the harmonized prohibition rules do.