



POLICY

Chemicals Action Plan: More 'plan' than 'action'

Has the Commission once again stepped in it? The recently released Chemicals Action Plan seems to raise more questions than answers and does very little to inspire confidence in the future of safer chemical use.

Published on 23 Jul 2025



It's now been two weeks since the EU Commission released the [Chemicals Action Plan](#) (and we have some thoughts).

While the plan promises to balance simplification with high protection for health and the environment, the details tell a different story.

What worries us:

REACH

We welcome the stated aim of “ensuring high levels of protection.” But there's no commitment to modernising REACH or introducing well-supported measures like the Mixture Assessment Factor (MAF) to account for real-world chemical exposures.

[👉 Read why MAF matters](#)

Critical molecules mapping

Strategic autonomy is important, but credibility is lost when hazardous substances like PFAS and PVC are included as “critical.”

This work must be guided by independent authority oversight, not industry self-interest.

Industrial policy

Supporting Europe's chemical sector cannot mean propping up outdated, fossil-based chemicals.

We must back future-proof companies, not extend the life of yesterday's pollution.

[👉 Read more: Europe can't build a green future with yesterday's chemicals](#)

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PFAS remediation and clarification

Remediation alone won't solve the PFAS crisis – it's a distraction without upstream bans.

And calls to “clarify PFAS” offer little clarity unless they acknowledge what's already well known:

- F-gases are PFAS
- Emission controls are not enough
- Alternatives exist

👉 [Our take: Why clean-up tech alone isn't the answer](#)
👉 [Busted: Five industry myths about the PFAS ban](#)
👉 [Start here if you want PFAS clarity](#)

Chemicals omnibus

The Action Plan was released alongside the Chemicals Omnibus – a file that weakens hazard labelling and allows carcinogens in cosmetics.

This is not simplification. This is deregulation.

👉 [Another huge blow to consumer health](#)

What we welcome:

A commitment to publish the uPFAS proposal swiftly, and limit derogations only to essential uses with no alternatives – and with incentives for substitution. If implemented as promised, this could reward innovators and move us closer to a toxic free future.

But overall: the plan lacks the boldness the moment demands

We urge the Commission to deliver on its promises – with real reforms, not rhetorical distractions.

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An independent non-profit organisation that advocates substitution of toxic chemicals to safer alternatives.