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CETS warns EU of disastrous ideology of NGOs

Covid-19 still has a grip on Europe, but some NGOs still refuse to learn the lessons of real life. The recent letter of EEB, ClientEarth, Chemsec, HEAL and Healthcare clearly shows, that they follow some traditional dogmatism neglecting all but their own naive view on society and business.

To tell the real truth and give an indication of what the impacts will be of their ideology, CETS has produced this paper which clearly outlines what will happen if the regulators follow this fundamentalist approach that suffers from lack of any scientific justification:

1. The “NGOs” do not understand the “wide and undefined” scope of authorization:

Reality check:

Using Chromium trioxide in surface treatment processes involves dealing with millions of different parts that are made functional only by a surface made of Chromium. The companies do not care about the further use of components, they just give the surface the properties needed. It is the business concept to be wide and undefined. Only in this way the technology can be open for future, innovative products in low numbers or even small customers dealing with specific products.

The requirement claimed by the NGOs will stop business in hundreds of surface treatment companies throughout the EU -together with their own jobs and those of their customers. We understand that the NGOs are not able to have an insight into surface treatment business, but they are invited to visit and learn any time.

2. The “NGOs” risk all business existence by insisting on “case-by-case” authorization:

Reality check:

- a. A case-by-case authorization has never been intended. Considering REACH we find, that the substitution has to be feasible for the surface treatment process applicator / downstream user.
- b. A company offering surface treatment services integrated in hundreds of supply chains will not be able to check all the millions of components for possible or nearly possible or just assumed “alternatives”. Even the NGOs should be able to recognize that “supply chain communication” of those numbers is simply not feasible. In fact, they would check for alternatives of Chromium, not Chromium trioxide.
- c. A simple question: Even if case-by-case study had been done: What about future products and components, let’s say...innovative products? Will it be covered by the existing authorization? Obviously not! Therefore, the innovative product has to hope several months or years for a positive decision. Obviously this will not grant a top position in development.

3. THE “NGOs” monotonously repeat the alleged huge hazard of modern technology:

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Reality check:

While we all are fighting a real threat in form of the Corona virus, they still claim that there are huge risks by using chemicals in modern technology. While people are dying daily they add further risk to our all existence. All that, just on assumptions. The risks are not observable – modern processes produce emissions similar to background levels and there are no cause-effect relations to the very, very low potential case numbers at the most.

4. What the “NGOs” are going to achieve:

Reality check:

The crisis of Corona will end in a disaster for many businesses across all sectors. Lots of companies will shut down or at least fall back to a very low production level. No one can estimate now, what this will mean for employment market and society. Even in this situation the NGOs dare to insist on measures risking huge supply chains, stopping business. They do not care for the future of workers and their families.

The repeated statements of the abovementioned NGOs about the supposed risk of the use of Chromium trioxide in modern facilities have been almost ridiculous in recent years. They can easily be unmasked as diffuse anxieties for real life and they had lost proportionality long before Covid-19 shutdown.

Covid-19 has shown clearly that there has to be a paradigm shift. Covid-19 was and is being defeated by hard working people, not by NGOs claiming there are risks that cannot be observed.

CETS puts its trust into the ability and readiness of authorities and committees to make decisions based on real facts – considering the insights given by Covid-19. We can no longer afford to follow imaginary ideas of such NGOs.

About CETS aisbl:

CETS was established in 1981 with the objective of providing a means for European manufacturers and suppliers of surface treatment plant; equipment and chemicals to exchange information on a wide range of topics of interest. The organisation gradually developed and began to encompass the applicators of coatings and one of its main achievements was the assistance that it provided to the European IPPC Bureau in the development of the Best Available Techniques Reference (BREF) document for the Surface Treatment of Metals (STM) and plastics.

CETS is an EU Accredited Stakeholder Organisation (ASO), working in co-operation with the European Chemicals Agency (ECHA) and a number of umbrella organisations from different fields and sectors. As an ASO, CETS works at an EU level and contributes with its vast knowledge to help ECHA reach out to wider audiences.

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