

## Statement

Brussels, 18 July 2023

## APAG's concerns on the intention to restrict 1,4-Dioxane

The Registry of Intentions published by ECHA on 19 April 2023 includes the preparation by the German authorities of a restriction proposal titled "Restriction of the manufacture, placing on the market and use of 1,4-dioxane in surfactants".

## The impact on basic oleochemicals producer (APAG Members)

APAG-Oleochemicals Europe, a sector Group of Cefic, represents well-established producers and suppliers of renewable oleochemicals and therefore is one of the main supporting sectors of the European biobased economy, employing over 10,000 workers and indirectly supporting 30,000 jobs, with a turnover exceeding €4 billion/year. We would like to raise awareness on the potential detrimental impact that the proposed restriction would bring into the supply chain.

Oleochemicals play an important role in the implementation of the biobased economy, which is a pivotal step towards achieving the European targets set to reduce Europe's greenhouse gas emissions and become climate neutral by 2050. APAG Members are supporting and actively contributing in this process, capitalising on the leading experience gained over more than a century. Biobased Renewable Oleochemicals can be used to support EU Member States in achieving their ambitious greenhouse gas reduction targets.

Approximately 80 % of fatty alcohols, one of the main products of the oleochemical group, is processed into surfactants. Should the production of surfactants in Europe be affected as a consequence of the current draft restriction proposal (which suggests a 1 ppm limit and absence in wastewater), it would pose significant challenges and heavy implications for commercial-scale implementation of alcohol ethoxylated sulfates, the most prevalent surfactant in the EU. Consequently, this would have a severe impact on producers of fatty alcohols, both synthetic and oleo-based.

The European biobased economy would face substantial adverse consequences should there be a decrease in the production of fatty alcohols, primarily sourced from raw materials derived from sustainably sourced sustainable palm oil. Beyond the potential negative impact on availability of detergents and shampoos, it would extend to various industries in Europe, including cosmetics, food and pharmaceuticals, as they rely on the by-products of fatty alcohols production.

In this sense, we are closely following all the steps and wish to foster an open and constructive dialogue with the Authorities, remaining open to questions and further discussions.

