President Ursula von der Leyen European Commission Rue de la Loi 200 Brussels 1049

Brussels, 08/10/2025

### Re: Call to action: Ensuring Our Sector's Recognition within the EU Chemical Industry Action Plan

Dear President von der Leyen,

We, the undersigned CEOs and leading executives of Europe's fuel manufacturing industry, are concerned about the oversight in the Commission's 'European Chemical Industry Action Plan' of our sector's strategic role in ensuring the resilience and global competitiveness of Europe's chemical industry. This lack of recognition risks undermining the Action Plan's objectives.

**Europe's refineries are critical to industrial clusters across Europe** and support resilience of our economy and society, military preparedness and energy security. In addition to supplying 97% of the energy used across all transport segments – road, aviation, maritime, military, and defence – our refineries also provide about 50% of the total feedstock needed by the Chemical Industry. Europe has about 20 petrochemical clusters, where petrochemical plants and refineries have been strategically colocated for decades and depend on each other for their future competitiveness. Together they employ hundreds of thousands of workers, directly and indirectly.

Like the chemical industry, **our refineries are challenged** by high energy and carbon costs, a complex and often contradictory regulatory environment, weak domestic demand, and global competitors benefitting from lower regulatory burden. Like the chemical industry, dozens of our **sites in Europe have been converted or closed**. Since 2009, 1 out of the 4 refineries in Europe has closed or transformed, representing a capacity reduction of almost 20 percent<sup>2</sup>. And like the chemical industry, our **refineries still lack a clear business case to attract multi-billion Euro investments** needed to transition to low-carbon and circular manufacturing needed to support Europe's ambitions. Without this investment, Europe risks becoming even more dependent on imports, possibly with a higher environmental footprint.

There is an urgent need to ensure Europe's refineries can continue to contribute to the EU's energy supply, enhance resilience, and protect Europe's strategic security and economic interests. We urge the European Commission and Member States to recognize the interdependence between the chemical and refining production facilities and initiate a Strategic Dialogue with the refining sector.

Specifically, a Strategic Dialogue for the Refining and Petrochemical Industries should:

Address the risk of dependence of the EU Chemical Industry on imported energy and feedstock
(fossil energy and feedstocks, bio-based feedstocks) as a key vulnerability and how the shift
towards sustainable and circular feedstocks in the refining sector should be supported as a
critical part of the chemical and transport industry's action plans;

¹ https://single-market-economy.ec.europa.eu/publications/european-chemicals-industry-action-plan\_en

<sup>&</sup>lt;sup>2</sup> 2009-2024: 32 refinery shutdowns (from 117 in 2009 to 85 in 2024), while 2 additional refineries have closed in 2025 across the EU27+3.

- Focus on designing effective measures (regulatory, financial or tools for moderating investment risks) to create a robust business case for investors in the transition of both the Chemical and the Fuel Manufacturing Industry;
- Invite our industry to **contribute to the relevant strategic dialogues** for the preparation and implementation of the Chemicals Industry Action Plan (including us also in the Critical Chemicals Alliance as a key stakeholder);
- **Enable an affordable transition** of the EU economy's closely interrelated, hard-to-abate sectors, such as Automotive, Aviation, Maritime, Chemicals, Defence and Military Mobility;

Our companies are eager to work with the European Commission, Member States and stakeholders across the value chains to drive forward the development and implementation of the EU's plans for Europe's strategic industries and broader economy.

Yours sincerely,



*Sergio Bovo* CEO, Alma Petroli



Finn Schousboe CEO, Crossbridge Energy A/S



Philippe Ducom
President, ExxonMobil



George Alexopoulos
Deputy CEO, Helleniq Energy



**Louise Kingham** Senior Vice President Europe, bp



**Umberto Carrara**Director Refining Evolution & Transformation, ENI



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#### Gabriel SZABÓ

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Ioannis N. Kosmadakis
Deputy CEO, Motor Oil (Hellas) S.A



*Heikki Malinen* CEO, Neste



Martijn van Koten

Executive Vice President Fuels & Feedstock, Chemicals, OMV



#### Witold Literacki

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## Sheida Khajavi

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# Marek Senkovič

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### **Vincent Stoquart**

President Refining & Chemicals, TotalEnergies