



TRANSPARENCY  
INTERNATIONAL EU



Corporate  
Europe  
Observatory



Thursday 17 July 2025

Dear Dr McGuinness,

As organisations dedicated to the transparency and ethics of the European Union, we are writing to raise our significant concerns regarding contracts between the European Chemicals Agency (ECHA) and Ramboll Germany GmbH (Ramboll). We urge you to take these concerns into consideration, and to review the contracts held with Ramboll.

### **Background on Ramboll and possible conflict of interest**

According to recent analysis by the research organisation ARIA, [published by investigative](#) outlet Follow the Money, Ramboll has a record of working with the [chemical industry](#), as well as others that include [tobacco](#) and [fossil fuels](#), to challenge [health regulations and lawsuits](#) related to the alleged harm caused by their products.

Since 2021 the EU has been working on regulation on per- and polyfluoroalkyl substances (PFAS) restriction under REACH.

Ramboll has been employed in shaping this upcoming regulation on PFAS and, at the same time, supported plastics lobby groups in their effort to push back against a proposed universal PFAS restriction.

Ramboll has been employed as a consultant by the ECHA since the end of 2020 and may continue to advise the agency until 2030. We are afraid the company may have exerted a harmful influence on draft PFAS regulations.

### **Problematic examples based on ARIA research**

- In 2022, Ramboll was [hired](#) by Plastics Europe's Fluoropolymers Product Group (FPG). It prepared advocacy materials for two of FPG's members - [Gujarat Fluorochemicals](#) (Page 109) and [Honeywell](#) - and for a German company called [FEG Textiltechnik](#). This material was sent to the ECHA as part of the industry consultation on PFAS restrictions held between March and September 2023.
- In the reports made for this industry, Ramboll claims that fluoropolymers should be excluded from the EU universal restriction on PFAS, arguing that these chemicals can be produced with ["negligible" emissions](#) (page 72). However, independent scientists involved in the Forever Lobbying Project reviewed this

last claim and [labelled it as “false”](#). In [November 2024](#), the ECHA announced that it is considering granting broader exemptions for these forever chemicals.

- Ramboll has focused on firefighting foams (FFF). A Wood/Ramboll [report](#) from 2020 stated that a longer transition period of up to 10 years is deemed appropriate for the chemicals and petrochemicals sectors. In March 2022, the ECHA published the [draft regulation](#) on FFF, granting the largest sectors, chemicals and petrochemicals, a transitional period of 10 years before phasing out these toxic foams.
- In a [report](#) prepared by Ramboll for the European Commission in 2020, the consultancy wrote that fluoropolymers are “polymers of low concern”, according to criteria developed by the Organisation for Economic Co-operation and Development (OECD). The OECD has in fact [denied](#) claims that it has classified fluoropolymers as “low concern” noting that a set of evaluation criteria was never finalised.

## **Our conclusions**

The above, the specific sector in which Ramboll operates and the clients it serves, as well as the larger industry associations to which it belongs (e.g. the [American Chemistry Council](#)), suggest a significant conflict-of-interest risk in Ramboll’s advising of the ECHA: Ramboll has been involved in advising clients, including in matters concerning delaying PFAS regulations, while at the same time advising the ECHA. Given its crucial role in providing scientific advice to the European Commission, the agency must exercise its mandate in a transparent and independent manner towards all stakeholders, to ensure the credibility of its decisions. This is a key requirement of both the [EU’s chemical legislation](#) and [case law](#).

According to the [Financial Regulation](#), “The authorising officer responsible shall reject from an award procedure a participant who has professional conflicting interests which may negatively affect the performance of the contract.” (Article 143 (d)). Professional conflicting interests are defined as “a situation in which the previous or ongoing professional activities of an economic operator affect or risk affecting its capacity to perform a contract in an [independent, impartial and objective manner](#)” (Art 2 (56)).

In addition, the *Vade Mecum on Public Procurement* [explains](#) possible situations of professional conflicting interest, stating that:

“This provision is meant to avoid any situations in [which the previous or ongoing professional activities of an economic operator, or even the personal situation of a key manager, affects its capacity to perform a contract](#) in an independent, impartial and objective manner” [emphasis added]. It provides examples of such situations (to evaluate a project in which it has participated or has vested interests; to audit accounts

which it has previously certified; to evaluate a programme under which it has previously received subsidies; or to conduct a study providing input to a Union policy regulating a sector where the operator has its business interests).

**We are of the opinion that ECHA did not properly assess this risk when it decided to award multiple contracts to Ramboll.**

We believe Ramboll has ongoing professional activities that could affect its capacity to perform services contracts with the ECHA. We are therefore writing to ask on what basis the ECHA decided this was not the case here.

We also request an urgent review of all of the ECHA's contracts with Ramboll in light of these professional conflicts of interest. It is vital that ECHA's consultants do not simultaneously hold contracts with corporate clients whose aim is to influence the outcome of the ECHA's work.

We kindly ask you to keep us informed about the progress of our letter.

We appreciate your attention to this matter and look forward to your response,

Signatories:

Corporate Europe Observatory

LobbyControl

The Good Lobby

Transparency International EU