



Downstream Users of Chemicals Co-ordination group

Comments from DUCC on CA/60/2020: REACH Review Action 3

The Downstream Users of Chemicals Co-ordination group (DUCC) thanks the European Commission for the opportunity to provide comments on the above document discussed at the 37th meeting of CARACAL on 17th November 2020.

DUCC is a platform representing 11 European associations whose member companies use chemicals to formulate mixtures (i.e. they are **downstream users** under REACH and are both recipients of extended SDS and suppliers of safety data sheets for mixtures). Communication on how chemicals can be used in a safe manner along the supply chain is key to secure proper risk control by downstream users. Thus, DUCC acknowledges the key role of formulators in the centre of the supply chain, since they need to ensure the safe use both of the substances/mixtures they receive and of the mixtures they place on the market.

As a co-founding participant in the CSR/ES Roadmap and ENES/ENES+, DUCC reiterates its commitment to the improvement of supply chain communication and to implementing and building on the tools already developed in the ENES community through the efforts of DUCC members among others. As such DUCC supports the general direction of the REACH Review Action 3 development plan as currently presented. The promotion of the Sector Use Maps as mentioned in the development plan is very welcome by the downstream users as well.

In particular DUCC stresses the need for a 'proof of concept' phase, and to develop the business case for the proposed way forward – especially concerning mechanisms for electronic exchange of SDS data, which could foreseeably add value for some but for many actors may require substantial investment and significant changes of practice. In a long run, new digital solutions could make supply chain communication more targeted and harmonised. An uniform exchange standard (e.g. XML-based) for conveying relevant safety data electronically along the supply chain could be useful if simple/user friendly interface solutions are developed as that would facilitate use of electronic exchange in all the supply chain. However, we would like to point out that any decision on the strategy to ensure implementation of any new digital solutions in the market can only be taken on the basis of a favourable assessment of the benefits versus the costs (not purely financial).

Brussels, 30 November 2020

About DUCC

DUCC is a joint platform of **11 European associations** whose member companies use chemicals to **formulate mixtures** (as finished or intermediary products) for professional and industrial users, as well as for consumers.

DUCC focuses on the downstream users' needs, rights, duties and specificities under **REACH** and **CLP**.

DUCC's membership represents several important industry sectors, ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals,

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fragrances, disinfectants, lubricants, and chemical distributors industries. Altogether, their membership comprises more than **9.000 companies** across the respective sectors in Europe, the vast majority being SMEs. The calculated turnover of these companies is more than **215 billion euros** in Europe.

For more information on DUCC: www.ducc.eu

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DUCC's public ID number in the **Transparency Register of the European Commission** is: **70941697936-72**