

DUCC comments on the ECHA Enforcement Forum's REF-6 Project Report on the classification and labelling of mixtures

DUCC and its member associations wish to acknowledge the release of the report on the <u>REACH-EN-FORCE 6 (REF 6) report on classification and labelling of mixtures</u>.

More time is needed for our sectors to analyse the data shared in the report but overall:

- Our members are committed to placing on the market products that are safe for use by consumers and workers and which respect European regulatory requirements.
- DUCC has taken several actions to contribute to the implementation of the classification, labelling and packaging requirements of chemical products. For example:
 - DUCC has actively engaged with the Forum working group on the SDS quality. DUCC members continue to engage in dialog with other stakeholders.
 - We continue to work on the topic, as further demonstrated by the work of DUCC and its members on Action 3 of the REACH Review on "Improving the workability and quality of extended safety data sheets".
 - Furthermore, DUCC is a co-founding member of important ECHA initiatives on the topic of supply chain communication and has a <u>history of supporting REACH</u>. DUCC sectors have spearheaded the creation of tools and activities to allow effective communication of safe use information throughout the supply chain like Use Maps and Safe Use of Mixtures Information (SUMIs).

We continue to take this topic seriously and to provide input to the Forum and ECHA to ensure tools for communicating information on chemicals are effective and accurate. DUCC members are keen to further discuss these findings with ECHA's Enforcement Forum and would welcome specific details regarding the results directly applicable to each downstream sector. We acknowledge that improvement in the classification, labelling and packaging of chemical products is an ongoing process. All DUCC members are committed to continuing and engaged participation in this process.

DUCC, 18 December 2019



Downstream Users of Chemicals Co-ordination group

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, fragrances, 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.

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