



Downstream Users of Chemicals Co-ordination group

## Inception Impact Assessment REVISION OF REGULATION (EC) 648/2004 ON DETERGENTS

### DUCC comments

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The Downstream Users of Chemicals Co-ordination group (DUCC), representing formulators of chemical mixtures for professional and industrial users as well as for consumers, welcomes the opportunity to comment on the inception impact assessment of the Detergents Regulation.

- The Detergents Regulation No 648/2004 is focussed for cleaning products, and its implementation by the Detergents and Maintenance products sector has been a success. It was stated in the Commission Staff Working Document on the evaluation of the Regulation, that the Detergent Regulation has achieved its aims to a large extent.<sup>1</sup>
- There are however some areas of potential improvement, in particular with regards to improving the coherence of the regulatory framework for detergents by addressing the overlaps and inconsistencies with the REACH, CLP and Biocidal Products Regulations. This is especially true of labelling requirements and solving the duplication and inconsistency between regulations is an important priority. DUCC supports the study being carried out by Commission on *simplification of the labelling requirements for chemicals and the use of e-labelling*. We refer to the [comments](#) made on this topic.
- It is crucial that the revision of the Detergents Regulation is taken in context of the full regulatory framework to ensure there will be no discrepancies and duplications between regulations in future.
  - The Detergents Regulation remains fit for purpose and we do not see the value of moving the Regulation under the New Legislative framework (NLF). With regards to setting product standards, this would impose a significant burden for industry without any benefits for the Regulation. Also, considering discrepancies between the NLF and other regulations applicable to Detergents is important.
  - Regarding the proposal for implementing ingredient restrictions under the Detergents Regulation, DUCC highlights that ingredients used in Detergents must already undergo a risk assessment through the REACH regulation and there are already tools in REACH for the restriction of ingredients in products. In addition, information on detergents is communicated to consumers via labelling requirements of CLP. DUCC, along with its members, has a long history of supporting the implementation of REACH and CLP

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<sup>1</sup> COMMISSION STAFF WORKING DOCUMENT EXECUTIVE SUMMARY OF THE EVALUATION of Regulation (EC) No 648/2004 of the European Parliament and of the Council of 31 March 2004 on detergents



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regulation<sup>2</sup>. This regulatory framework is also under discussion and will be revised under the Chemicals Strategy for Sustainability. The new requirements will also need to be considered to avoid duplication or discrepancy in the future.

## 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, 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](http://www.ducc.eu)

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

<sup>2</sup> See Factsheet: DUCC's history of supporting REACH [https://static.ducc.eu/media/file/2021-08/DUCC%20history%20of%20supporting%20REACH\\_final%205%2011%202018.pdf](https://static.ducc.eu/media/file/2021-08/DUCC%20history%20of%20supporting%20REACH_final%205%2011%202018.pdf)

Achievements of DUCC in a nutshell: [https://static.ducc.eu/media/file/2021-10/DUCC\\_Leaflet\\_2021\\_0.pdf](https://static.ducc.eu/media/file/2021-10/DUCC_Leaflet_2021_0.pdf)