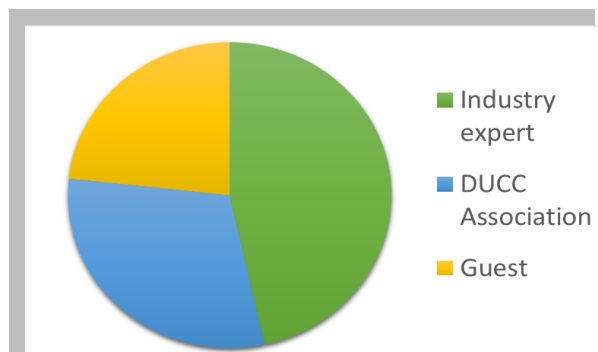


DUCC MAF Workshop Summary

18 February 2022, from 14:00 – 17:00 CET

On the 18th February DUCC organised a workshop on the MAF with the consultant Wood. The meeting included 43 participants in total. With a mixture of experts from the 11 industry sectors that are members of DUCC, association representatives, company experts and guests.

The workshop began with a series of presentations from the different sectors.



- **Crop LiFe Europe:** Case study: co-formulants
- **A.I.S.E.** Case study: LAS
- **CEPE:** Preliminary impact on our coating sector and a proposal to focus on what matters
- **Cosmetics Europe:** Human health cosmetic case study and what public health implications an additional safety factor could have
- **IFRA:** FRA methodology Economic Impact Analysis

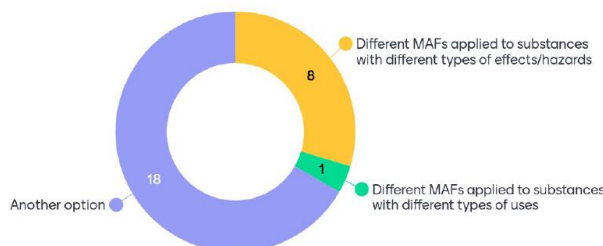
The examples from the different sectors described how a blanket MAF will have substantial impacts on downstream users. These impacts cannot always be mitigated.

Various examples were brought forward to demonstrate that a blanket MAF will result in a great number of impacts on valuable, sustainable substance uses, animal testing and other key issues. A more targeted approach however, that focusses on what matters, will allow the objective of addressing unintended mixtures while still permitting for the resources of industry to be targeted and well directed towards reaching the objectives of the Green Deal.

The MAF should be applied to substances that, based on their characteristics, can end up in an unintended mixture and, if so, contribute to the mixture toxicity. Unintentional co-exposure has spatial and temporal dimensions. Because the likelihood of possible unintentional co-exposure to chemicals for Human Health and to the Environment is highest for substances that can bioaccumulate, and substances that are persistent, respectively, the focus of MAF should be on PBTs that are used in high tonnages and wide dispersive uses.

C1: If a Mixture Assessment Factor (MAF) were introduced into REACH chemical safety assessments, do you think there should be

Mentimeter



27

Impact of a blanket MAF:

We have identified the following impacts to downstream users from a blanket MAF:

- Need for reformulation of mixtures
- Losing valuable, sustainable substance uses
- Reduction of the ingredient portfolio available to make formulations (fewer options, leading to innovation loss). Manufacturers may decide not to supply a substance any longer, with an impact on downstream users. This will be especially true if that substance is crucial to the DU sector.
- Higher level of efforts of the creation of DU CSR – high impact for SMEs
- Forcing more CSA done at DU or even end-user DU level, who can have less expertise and resources to do them
- Increase in administrative work
- Further SDS exposure scenario fragmentation (i.e. more). Diversion (waste) of resources in recalculation exercises.
- Loss of efficacy of final products
- In some sectors, sectoral legislation is in place that obliges the registration and approval of mixtures before these are placed on the market. If there is an obligation to reformulate a large number of mixtures, due a blanket MAF approach, companies will need to re-submit product dossiers with large costs.
- It is not clear to downstream users how to deal with multiple MAFs being applied to all the different ingredients being used in a formulation. Downstream users do not only consider one ingredient at a time, but all the ingredients in their mixture.
- End customers to use more PPE. An related to this, increasing RMMs may cause workers to disregard the additional measures as these could be seen as disproportionate.
- High impact on solvents. A long pipeline of reformulations and search for alternatives.
- Unacceptable increased requirement for animal tests

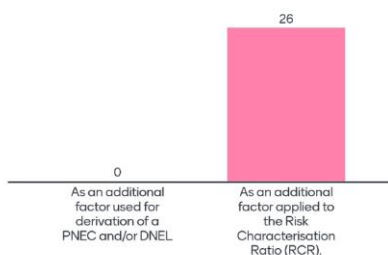


Downstream Users of Chemicals Co-ordination group

Including a MAF in REACH:

DUCC support for **adding the MAF as an additional factor applied to the risk characterisation ratio (RCR)**. In this case, safe use would be demonstrated when the RCR has a value less than $1/MAF$, making the MAF a risk management tool.

N1: The MAF could be incorporated in Annex I of REACH in two main ways. Which do you favour? 



- Adding a MAF to PNEC and DNEL would also affect intentional mixtures.
- Adding a MAF to PNEC and DNEL will have a carry over impact on sectors that use the PNEC and DNELs without possibility for refinement

Naturally occurring & non-threshold occurring chemicals:

- If naturally occurring substances also pose risks, there is no reason to differentiate them from man-made chemicals.
- If the substance is not hazardous or the hazard is well managed, it should be treated like man-made chemicals.
- Don't see it necessary to apply for non-threshold substances, as they are assessed on very low risk concept which is quite conservative
- For some substances considering background concentration may be of value
- In fact, DUCC would like to raise that asking this question, is in itself, a justification for a differentiated approach to MAF depending on the properties of specific substances.

The workshop was a good occasion to engage, and sectors of DUCC will continue working on the topic to provide constructive input to the topic.



Downstream Users of Chemicals Co-ordination group

DUCC MAF Workshop

AGENDA

18 February 2022, from 14:00 – 17:00 CET

By WebEx

1. **Welcome and Introduction 14:00 – 14:05**
2. **Wood presentation on the aims of the project and overview 14:05 – 14:15**
3. **Sector presentations 14:15 – 15:45**

Crop LiFe Europe	Case study: co-formulants	15 min
A.I.S.E.	Case study: LAS example and A.I.S.E. paper	15 min
CEPE	Preliminary impact on our coating sector and a proposal to focus on what matters	15 min
Cosmetics Europe	Human health cosmetic case study and what public health implications an additional safety factor could have	15 min
Q&A		

--- BREAK ---

4. **IFRA methodology Economic Impact Analysis 15:45 – 16:05**
5. **DUCC response to Wood questions 16:05 – 16:35**
6. **Discussion and next steps**