



Downstream Users of Chemicals Co-ordination group

DUCC Comments on the EU Year of Skills 2023

DUCC is a platform of 11 European associations which represent “**downstream**” **formulating** industries from: cosmetics, detergents, aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, lubricants, crop protection and chemical distributors industries. The group's main objective is to contribute, with a common voice, to the successful implementation of the requirements of chemicals legislation. We thank the Commission for the opportunity to comment on the EU Year of Skills.

DUCC wishes to engage to make information on safe handling of chemicals more accessible and understandable for professional workers. In this context we think a valuable initiative could be to create an online platform at EU level that could provide information to professionals on:

- Generic safety training for different applications/professions (not substance-specific)
- Information on the applicable Occupational Safety and Health (OSH) requirements in each Member State: checklist for professionals
- Information on the applicable REACH requirements: checklist for professionals
- Information on safe handling to avoid impacts on human health and the environment
- Additional training materials to support professionals with specific needs

Access of information through this platform, would support in equipping the EU workforce with the skills needed so that the green and digital transitions are socially fair and just.

Such a platform would be useful in different situations, such as:

- Supporting employers in giving the mandatory Occupational Safety and Health training for employees
- Supporting self-employed professionals to achieve a similar level of protection as employed professionals
- Serving as the proof of training for safe use of chemicals as defined in REACH
- Providing a training source for those professionals with no/limited access to training otherwise.
- Providing skills on sustainable and durable solutions to professionals in support of the green transition

DUCC can also see how this initiative could aim for consistency with other EU policies – in particular it represents an opportunity to target a long-standing issue: increased alignment between REACH legislation (under the EU Green Deal) and OSH legislation.

Relevance to EU Year of Skills

As acknowledged in *RECITAL 10 of the Proposal for a DECISION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a European Year of Skills 2023*, “companies and other stakeholders know best what skills are needed in their industrial ecosystems, strengthening their collective action on skills development has to be part of the solution.” The proposal in question is well in line with this objective.

The platform also seeks to adopt learnings from other past projects. In the context of REACH and the diisocyanates restriction¹, industry along the entire supply chain worked closely together to develop the required sets of training materials and a platform for all users to access training for use of diisocyanates (<https://www.safeusediisocyanates.eu/>). Three DUCC members (FEICA, CEPE, EFCC) collaborated with other sectors across the supply chain on this project. These substances are crucial for important applications in the construction sector to enable repair and allow sustainability improvement (e.g. for adhesives, sealants, coatings and other applications of construction chemicals).

DUCC and its members plan to engage on this topic and hope for such an initiative, contributing to the training and upskilling of the European workforce, to be supported as one of the building blocks of the European Year of Skills. We look forward to engagement and input on this issue.

¹ [Commission Regulation \(EU\) 2020/1149 of 3 August 2020 amending Annex XVII to Regulation \(EC\) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals \(REACH\) as regards diisocyanates](#)