



Downstream Users of Chemicals Co-ordination group

Chemical Data Flows

DUCC comments

The Downstream User of Chemicals Coordination Group (DUCC), representing 11 European associations, whose member companies use chemicals to formulate mixtures, wishes to share the following considerations to the discussions on chemical data flows.

There seem to be different actions ongoing that deal, albeit differently, with data communication:

Data communication within the supply chain:

- **Ecodesign of Sustainable Products Regulation (ESPR)/Digital Product Passport (DPP)** --> Part of the Circular Economy Package, the ESPR extends the EcoDesign approach. It includes the Digital Product Passport as a structured collection of product related data with a predefined scope and agreed data ownership and access rights, conveyed through a unique identifier. DUCC understands that the digital product passport will be considered for data transfer of Substances of Concern (SoC). The definition of SoC is different in the ESPR compared with other legal texts/proposals (e.g., Chemicals Strategy for Sustainability-REACH revision working documents) — but the safety information that will need to be conveyed, should be linked to the Safety Data Sheets that are required under REACH and therefore to the point below.
- **DUCC Cefic Work on Supply Chain Communication** --> DUCC and Cefic are progressing work on improving supply chain communication of data on Safety Data Sheets and Exposure Scenarios in the context of REACH. Industry discussions are taking place on minimum requirements and common XML format for safety data. This is done with the view that in the next REACH revision, ECHA may be given a mandate to begin working on an XML format and REACH amendments, to include requirements for electronic Safety Data Sheets (including pdf, email, XML and/or other electronic formats).

Data communication to authorities or within authorities:

- In this context we also highlight REACH discussions on new **Downstream User reporting Requirements** on use and exposure.
- **One Substance One Assessment** (Chemical Data Flows) -->DUCC notes that this also includes components on Data Formats and Open Data Platforms.
- Finally, we highlight existing requirements for **Poison Centre Notifications**.

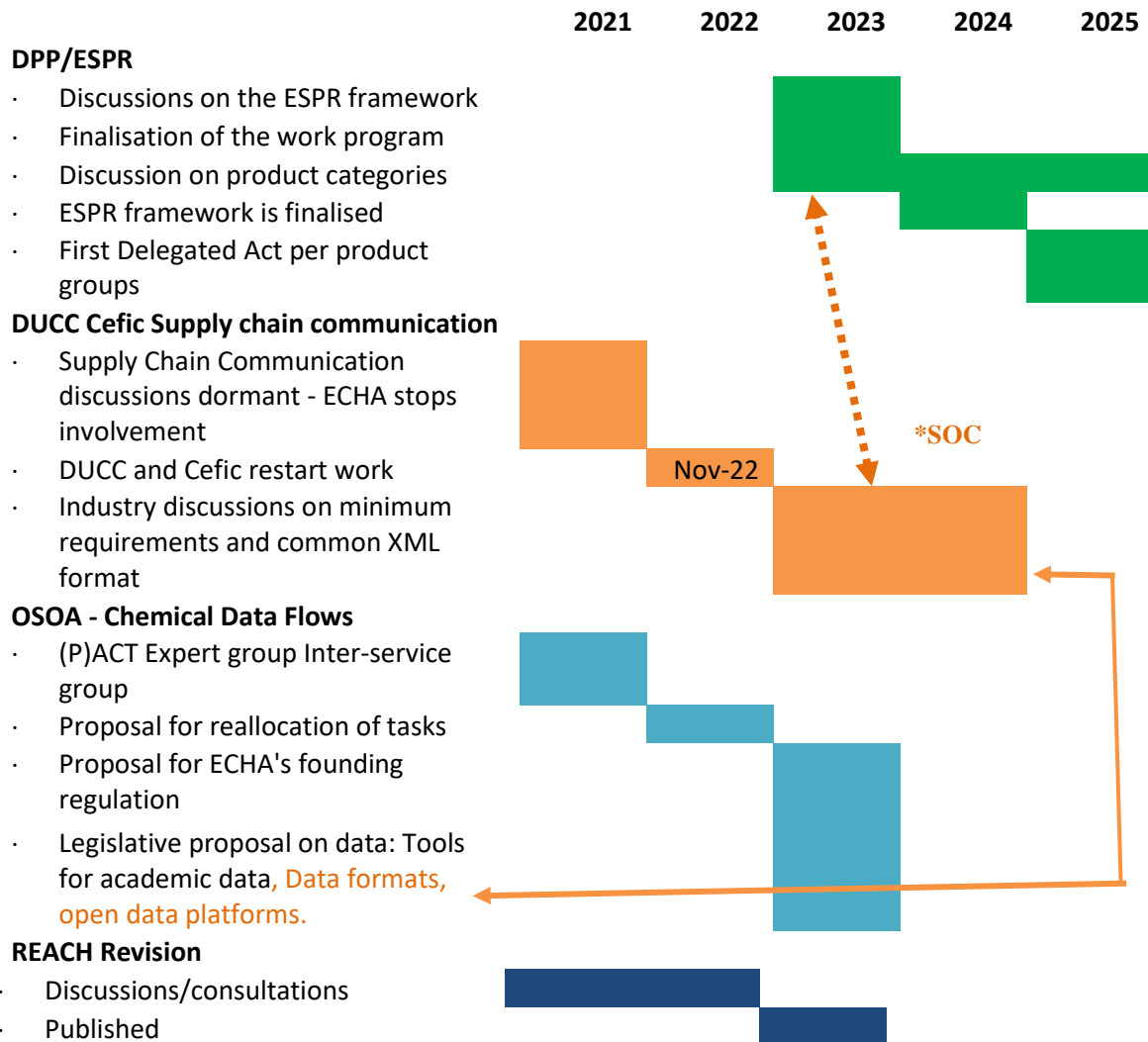
The worse-case scenario is that industry is obliged to provide input and manage two or more digital different communication formats. Discrepancy will affect, not just chemical and mixture producers, but end-users at all points the value chain.

DUCC stresses the need to be efficient, aligned on timings and avoid double data requirements.



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GANTT CHART SHOWING OUR ESTIMATES OF TIMING AND RELATIONSHIPS BETWEEN TOPICS



*SOC = Substances of Concern



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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, crop protection, 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**