



Downstream Users of Chemicals Co-ordination group

Delegated Regulation amending Regulation 1272/2008 as regards hazard classes and criteria for the classification, labelling and packaging of substances and mixtures

Statement

DUCC, representing 11 EU industry sectors who use chemicals to formulate mixtures makes the following comment on the Delegated Act Amending CLP for new hazard classes (ED, PBT/vPvB, PMT/vPvM)

As a horizontal legislation CLP has wide-ranging impact, with knock-on effects on other legal frameworks like, biocides, pesticides, detergents, toys, and medical devices. DUCC strongly urges the EU Commission to consider sectorial implications of CLP, particularly the impacts of the new hazard classes combined with new expected requirements in REACH – i.e., the Generic Risk Management Approach.

DUCC agrees with other organisations that have expressed these should first be implemented under the UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

We are also concerned regarding the transition periods and if these will allow sufficient time for changes to be implemented to the classification and labelling of downstream user formulator portfolios.

With many of DUCC members as active participants of EPAA (the European Partnership for Alternative Approaches to Animal Testing) DUCC will work to bring the expertise of our members to engage on Non-Animal Methods/ New Approach Methodologies (NAMs) and how these need to be reflected in the new data requirements.

We are committed to contribute constructively, bring the expertise of formulators to the discussion and work towards the timely creation of relevant, effective guidance.



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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**